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THE MASSACHUSETTS INSTITUTE OF
TECHNOLOGY and
ELECTRONICS FOR IMAGING, INC.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TEXAS

TEXARKANA DIVISION

(1) THE MASSACHUSETTS INSTITUTE OF TECHNOLOGY, a Massachusetts corporation, and (2) ELECTRONICS FOR IMAGING, INC., a Delaware corporation, Plaintiffs, v. (1) ABACUS SOFTWARE INC., a Michigan corporation; (2) ABS COMPUTERS, INC., a Pennsylvania corporation; (3) ACD SYSTEMS, INC., a Texas corporation; (4) ACER AMERICA CORPORATION, a California corporation; (5) ACER COMMUNICATIONS & MULTIMEDIA, INC., a foreign corporation; (6) ACHIEVER INDUSTRIES LIMITED, a foreign corporation; (7) AEVERMANN SOFTWARE GMBH, a foreign corporation; (8) AGFA CORPORATION, a Delaware corporation;	Case No. 501CV344 **FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF FOR PATENT INFRINGEMENT (35 U.S.C. SECTION 271)**

1	(9) AIPTEK INCORPORATED, a California corporation;
2	(10) ALCHEMY MINDWORKS, INC., a foreign corporation;
3	(11) ALPAR INTERNATIONAL CORPORATION,
4	a Tennessee corporation; (12) AMPLEX CORPORATION,
5	a Connecticut corporation; (13) ANSCO, INC.,
6	a Delaware corporation; (14) ANTEC, INC.,
7	a California corporation; (15) APPLICATION TECHNIQUES, INC.,
8	a Massachusetts corporation; (16) ARCSOFT, INC.,
9	a California corporation; (17) ARGUS CAMERAS, INC.,
10	a Delaware corporation; (18) ARTRONIX TECHNOLOGY, INC.,
11	a California corporation; (19) AUTOLOGIC INFORMATION
12	INTERNATIONAL, INC., a Delaware corporation;
13	(20) AVER SOFTWARE TECHNOLOGIES LTD., a foreign corporation;
14	(21) AVISION LABS, INC., a California corporation;
15	(22) AZTEK, INC., a California corporation;
16	(23) BENQ, INC., a foreign corporation;
17	(24) BETTER LIGHT, INC., a California corporation;
18	(25) BINUSCAN, INC., a New York corporation;
19	(26) BLACKBOARD SOFTWARE, INC. a Colorado corporation;
20	(27) BOOMERANG SOFTWARE, INC., a Massachusetts corporation;
21	(28) BUY.COM, INC., a Delaware corporation;
22	(29) CADLINK TECHNOLOGY CORPORATION,
23	a Delaware corporation; (30) CALDERA GRAPHICS,
24	a foreign company; (31) CASIO, INC.,
25	a New York corporation; (32) CDH PRODUCTIONS,
26	a North Carolina corporation; (33) CERIOUS SOFTWARE, INC.,
27	a North Carolina corporation; (34) CIRCUIT CITY STORES, INC.,
28	a Delaware corporation;

1	(35) CLUB PHOTO, INC., a California corporation;
2	(36) COLORBYTE SOFTWARE, a Florida company;
3	(37) COLORGATE CORPORATION, a Delaware corporation;
4	(38) COLORVISION, INC., A DIVISION OF DATACOLOR, a Delaware corporation;
5	(39) COMPUSA, INC., a Delaware corporation;
6	(40) COMPUTERINSEL GMBH, a foreign corporation;
7	(41) COMPUTER LINK, INC., a Texas corporation;
8	(42) CONCORD CAMERA CORPORATION,
9	a New Jersey corporation; (43) CONTEX SCANNING TECHNOLOGY,
10	INC., a California corporation; (44) COREL CORPORATION,
11	a Delaware corporation; (45) COSMI CORPORATION,
12	a California corporation; (46) COSTCO WHOLESALE
13	CORPORATION, a Washington corporation;
14	(47) THE CPDI GROUP, an Arizona company;
15	(48) CURSORARTS COMPANY, an Oregon corporation;
16	(49) DELL COMPUTER CORPORATION, a Delaware corporation;
17	(50) DENEBA SYSTEMS INC., a Florida corporation;
18	(51) DIGITAL NOW PLUS, INC., a Delaware corporation;
19	(52) DIGITAL PORTAL INCORPORATED, a Delaware corporation;
20	(53) DIGITAL RIVER, INC., a Delaware corporation;
21	(54) E-BOOK SYSTEMS, INC., a California corporation;
22	(55) ELECTRONICS BOUTIQUE OF AMERICA, INC.,
23	a Pennsylvania corporation; (56) ELEMENT 5, INC.,
24	a Delaware corporation; (57) EXPRESS DIGITAL GRAPHICS, INC.,
25	a Colorado corporation; (58) EXTENSIS PRODUCTS GROUP,
26	an Oregon corporation; (59) EZONICS CORPORATION,
27	a California corporation; (60) FIREHAND TECHNOLOGIES
28	CORPORATION,

1	an Oklahoma corporation;
	(61) FORM & VISION GMBH,
2	a foreign corporation;
	(62) FOTOWARE A.S.,
3	a foreign corporation;
	(63) FRY'S ELECTRONICS, INC.,
4	a California corporation;
	(64) FUJITSU COMPUTER PRODUCTS OF
5	AMERICA, INC.,
	a California corporation;
6	(65) GIC TECHNOLOGY, INC.,
	a Massachusetts corporation;
7	(66) GRAPHIC ENTERPRISES OF OHIO,
	INC., an Ohio corporation;
8	(67) GRAPHICS ONE, LLC,
	a California corporation;
9	(68) GREENSTREET CORPORATION,
	a foreign corporation;
10	(69) GRETAG IMAGING, INC.,
	a Massachusetts corporation;
11	(70) GTCO CALCOMP, INC.,
	a Maryland corporation;
12	(71) GUILDSOFT LTD.,
	a foreign corporation;
13	(72) HAMRICK SOFTWARE,
	an Arizona corporation;
14	(73) HEMERA TECHNOLOGIES,
	a foreign company;
15	(74) HOWTEK, INC.,
	a Delaware corporation;
16	(75) HP MARKETING CORPORATION,
	a New Jersey corporation;
17	(76) IDRUNA SOFTWARE, INC.,
	a California corporation;
18	(77) IMACON, INC.,
	a Texas corporation;
19	(78) IMAGEWARE SYSTEMS, INC.,
	a California corporation;
20	(79) IMAGING TECHNOLOGIES
	CORPORATION,
21	a Delaware corporation;
	(80) IMAPRO 2000, INC.,
22	a foreign corporation;
	(81) INTERNATIONAL
23	MICROCOMPUTER SOFTWARE,
	INC., a California corporation;
24	(82) INVENTION OFFICE RG,
	a foreign corporation;
25	(83) INVENTION PILOT, INC.,
	an Illinois corporation;
26	(84) I/O MAGIC CORPORATION,
	a Nevada corporation;
27	(85) IOMEGA CORPORATION,
	a Delaware corporation;
28	(86) iVIEW MULTIMEDIA LTD.,

a foreign company;

(87) IXLA USA, INC.,
a Connecticut corporation;

(88) JASC SOFTWARE, INC.,
a Minnesota corporation;

(89) JETSOFT DEVELOPMENT COMPANY
(AKA JETSOFT, INC.),
an Ohio corporation;

(90) JOBO LABORTECHNIK GMBH & CO.
KG, a foreign corporation;

(91) J&R ELECTRONICS, INC.,
a New York corporation;

(92) KAISER FOTOTECHNIK GMBH &
CO. KG, a foreign corporation;

(93) KB GEAR, INC. (AKA KB GEAR
INTERACTIVE),
a Minnesota corporation;

(94) KIS PHOTO-ME-GROUP,
a foreign company;

(95) KYOCERA INTERNATIONAL, INC.,
a California corporation;

(96) KYOCERA OPTICS, INC.,
a New York corporation;

(97) LANDOFCOM SOFTWARE,
a Minnesota corporation;

(98) LARGAN, INC.,
an Arizona corporation;

(99) LASERSOFT IMAGING, INC.,
a Florida corporation;

(100) LEAD TECHNOLOGIES, INC.,
a North Carolina corporation;

(101) LEGASYS INTERNATIONAL,
a Colorado corporation;

(102) LEICA CAMERA AG,
a foreign corporation;

(103) LEXAR MEDIA, INC.,
a Delaware corporation;

(104) LINKER SYSTEMS, INC.,
a California corporation;

(105) MACMILLAN SOFTWARE (AKA
MACMILLAN USA AND
MACMILLAN PUBLISHING),
a Maryland corporation;

(106) MACROMEDIA, INC.,
a Delaware corporation;

(107) MATSUSHITA ELECTRIC
INDUSTRIAL CO., LTD.,
a Delaware corporation;

(108) MEDIACHANCE,
a foreign company;

(109) MEDIA DIMENSIONS LLC,
a New Jersey corporation;

(110) MEGALUX LIGHT TECHNIQUE,
LTD., a foreign corporation;

(111) MEGAVISION, INC.,

a California corporation;
(112) MEMTEK PRODUCTS, INC.,
a California corporation;
(113) MGI SOFTWARE CORPORATION,
a foreign corporation;
(114) MICRO ELECTRONICS, INC. (DBA
MICRO CENTER – THE COMPUTER
DEPARTMENT STORE), a Delaware
corporation;
(115) MICRO FRONTIER, INCORPORATED,
an Iowa corporation;
(116) MICROGRAFX, INC.,
a Texas corporation;
(117) MICROSOFT CORPORATION,
a Washington corporation;
(118) MICROTEK LAB, INC.,
a California corporation;
(119) MMEDIA RESEARCH CORP.,
a Florida corporation;
(120) MULTIMEDIA 2000 CO.,
a Delaware corporation;
(121) MUSTEK, INC.,
a California corporation;
(122) NEC COMPUTERS, INC.,
a Delaware corporation;
(123) NEOSOFT CORP.,
an Oregon corporation;
(124) NEWSOFT AMERICA, INC.,
a California corporation;
(125) NEWTEK, INC.,
a Kansas corporation;
(126) NEW WORLD SOFTWARE,
a foreign company;
(127) NIKON, INC.,
a New York corporation;
(128) NORITSU AMERICA CORPORATION,
a California corporation;
(129) NORTHSTAR SOLUTIONS,
a Kansas company,
(130) NOVA DESIGN, INC.,
a Virginia corporation;
(131) NOVA DEVELOPMENT
CORPORATION,
a California corporation;
(132) NUTREND COMPUTER PRODUCTS,
INC., a California corporation;
(133) NUWAVE TECHNOLOGY, INC.,
an Ohio corporation;
(134) OFOTO, INC., a Delaware corporation;
(135) OLYMPUS AMERICA, INC.,
a New York corporation;
(136) PACIFIC IMAGE ELECTRONICS, INC.
(AKA P.I.E.),
a California corporation;
(137) PANDASOFT, a foreign company;

1	(138) PEGASUS IMAGING CORPORATION, a Florida corporation;
2	(139) PENTACON GMBH, a foreign corporation;
3	(140) PENTAX CORPORATION, a Delaware corporation;
4	(141) PHASE ONE UNITED STATES, INC., a New York corporation;
5	(142) PHOTODEX CORPORATION, a Texas corporation;
6	(143) PHOTOWORKS, INC., a Washington corporation;
7	(144) PICMASTER, a foreign company; (145) PIERRESOFT, a foreign company;
8	(146) PIXEL MAGIC IMAGING, INC., a Delaware corporation;
9	(147) PLUSTEK USA, INC., a California corporation;
10	(148) POLAROID CORPORATION, a Delaware corporation;
11	(149) POLYBYTES, an Iowa company; (150) POLYWELL COMPANY, INC.,
12	a California corporation; (151) PRIMASCAN, a foreign company;
13	(152) PRIMAX AMERICA, a foreign company;
14	(153) PRIMAX ELECTRONICS LTD., a foreign company;
15	(154) PRINTROOM.COM, A BUSINESS UNIT OF LEXAR MEDIA, INC.,
16	a Delaware corporation; (155) PURUP-ESKOFOT, INC.,
17	a Georgia corporation; (156) QBEO INC.,
18	a Washington corporation; (157) RCA, a Delaware corporation;
19	(158) REGISTER NOW! (AKA REGNOW, REGNOW.COM),
20	a Washington company; (159) REGSOFT.COM, INC.,
21	a Georgia corporation; (160) RFX, INC., a California corporation;
22	(161) RL VISION, a foreign company; (162) ROLAND DGA CORPORATION,
23	a California corporation; (163) ROLLEI FOTOTECHNIC GMBH,
24	a foreign corporation; (164) RON SCOTT, INC.,
25	a Texas corporation; (165) ROXIO, INC.,
26	a Delaware corporation; (166) SAMY'S CAMERA, INC.,
27	a California corporation; (167) SANYO NORTH AMERICA
28	CORPORATION,

a Delaware corporation;
(168) SCANPORT, INC.,
a California corporation;
(169) SCANSOFT, INC.,
a Delaware corporation;
(170) SCANVEC AMIABLE LTD.,
a Pennsylvania corporation,
(171) SCHNEIDER OPTICS, INC.,
a Delaware corporation;
(172) SCM MICROSYSTEMS, INC.,
a Delaware corporation;
(173) SEARS, ROEBUCK & COMPANY,
a New York corporation;
(174) SEITZ PHOTOTECHNIK AG,
a foreign corporation;
(175) SERIF, INC.,
a New Hampshire corporation;
(176) SIERRA ON-LINE, INC.,
a Delaware corporation;
(177) SIGMA PI DESIGN,
a foreign company;
(178) SILVERLAB SOFWARE, INC.,
a Delaware corporation;
(179) SINAR AG, a foreign corporation;
(180) SIPIX INC., a Delaware corporation;
(181) SOFTWARE VISION CORPORATION,
a Florida corporation;
(182) SONY ELECTRONICS INC.,
a Delaware corporation;
(183) SOUND VISION, INC.,
a Massachusetts corporation;
(184) SPACEWARD GRAPHICS LTD.,
a foreign company;
(185) SPG INC., a Florida corporation;
(186) STOIK SOFTWARE,
a foreign company;
(187) STOMP, INC.,
a California corporation;
(188) SUMMITSOFT CORPORATION,
a Colorado corporation;
(189) SUM SOFTWARE, a foreign company;
(190) TARGET CORPORATION,
a Minnesota corporation;
(191) TECHNOTAPE USA, INC.,
a Delaware corporation;
(192) TECHWORKS, INC.,
a Delaware corporation;
(193) TECSA LIMITED,
a foreign corporation;
(194) TELEPIX IMAGING, INC.,
a foreign corporation;
(195) THOMSON MULTIMEDIA, INC.
an Indiana corporation;
(196) TINY COMPUTERS, INC.,
a Washington corporation;

1	(197) TINY COMPUTERS LIMITED, a foreign corporation;
2	(198) ULEAD SYSTEMS, INC., a California corporation;
3	(199) UMAX TECHNOLOGIES, INC., a California corporation;
4	(200) VALUSOFT, INC., a Minnesota corporation;
5	(201) VCW, a foreign company;
6	(202) VIDAR SYSTEMS CORPORATION, a Virginia corporation;
7	(203) VIDCOM CENTER, INC., a Texas corporation;
8	(204) VISIONEER, INC., a California corporation;
9	(205) VIVITAR CORPORATION, a California corporation;
10	(206) WACOM TECHNOLOGY CORPORATION,
11	a California corporation; (207) WASATCH COMPUTER
12	TECHNOLOGY, INC., a Utah corporation;
13	(208) WASHINGTON COMPUTER SERVICES, a New York corporation;
14	(209) WORKFLOW IMAGING, a California corporation;
15	(210) WORLD OFFICE PRODUCTS MANUFACTURING, INC.,
16	a Florida corporation; (211) WRIGHT TECHNOLOGIES
17	(CANADA) LTD., a foreign company; (212) WRIGHT TECHNOLOGIES PTY LTD.,
18	a foreign company; and, (213) XAOS TOOLS, Inc.,
19	a California corporation; (214) ZONES, INC., a Washington
20	corporation.
21	Defendants.
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Plaintiffs, The Massachusetts Institute of Technology ("MIT") and Electronics for

Imaging, Inc. ("EFI") (collectively, "Plaintiffs"), for their claims against Defendants allege as follows:

JURISDICTION AND VENUE

1.   Plaintiffs file this action against Defendants for patent infringement under 35 U.S.C. Section 1, *et seq.* This Court has subject matter jurisdiction over this patent infringement action under 28 U.S.C. Sections 1331 and 1338(a).

2.   Defendants regularly conduct business in this judicial district, have offered to sell, offer to sell, have sold and sell infringing products in this judicial district and are subject to personal jurisdiction in this judicial district.

3.   Venue is proper under 28 U.S.C. Sections 1391 (b)(1), (b)(2), (b)(3), (c) and (d).

THE PLAINTIFFS

4.   MIT is a Massachusetts corporation with its principal place of business at 77 Massachusetts Avenue, Cambridge, Massachusetts 02139.

5.   MIT is one of the world's most prestigious educational institutions. MIT's faculty and students are known and esteemed for their technological innovations, which MIT continues to protect vigorously.

6.   EFI is a Delaware corporation headquartered in Foster City, California. EFI conducts business in this judicial district at 101 East Park Boulevard, Suite 600, Plano, Texas 75074.

7.   EFI designs, develops, manufactures and markets high quality, innovative color management computer software and hardware products that are the subject of extensive patent protection. EFI sells its products throughout the United States, including in this judicial district.

U.S. PATENT NO. 4,500,919

8.   On February 19, 1985, United States Patent No. 4,500,919 (the "'919 Patent") for a Color Reproduction System issued to MIT professor William Schreiber and was duly and legally assigned to MIT, who has been the owner of the '919 Patent since that date. On or about February 9, 1990, MIT granted to EFI an exclusive license under the '919 Patent, including the right to enforce the '919 Patent. A copy of the '919 Patent is attached hereto as Exhibit A.

9. Since receiving its exclusive license from MIT, EFI diligently has enforced its rights under the '919 Patent through licensing and litigation. Market leaders such as Apple, Adobe, Global Graphics, Kodak and Xerox have taken licenses under the '919 Patent. Moreover, EFI consistently has marked all of its applicable products with the '919 patent pursuant to 35 U.S.C. Section 287 and has required its licensees to do the same. Defendants therefore had knowledge of the '919 patent since at least February 1990.

THE DEFENDANTS

10. Plaintiffs allege on information and belief that Abacus Software Inc. ("Abacus") is a Michigan corporation with a place of business at 5370 52nd Street S.E., Grand Rapids, Michigan 49512. Abacus has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Photo CD Workshop.

11. Plaintiffs allege on information and belief that ABS Computers, Inc. ("ABS") is a Pennsylvania corporation with a place of business at Luxembourg Corporate Center, 407 Executive Drive, Langhorne, Pennsylvania 19047. ABS has offered to sell, offers to sell, has sold and sells infringing computer systems bundled with scanners and color image editing software in the United States and in this judicial district, including but not limited to Performance and Conquest computer systems.

12. Plaintiffs allege on information and belief that ACD Systems, Inc. ("ACD") is a Texas corporation with a place of business at 2201 North Collins, #100, Arlington, Texas, 76011. ACD has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to FotoCanvas and ACDSee.

13. Plaintiffs allege on information and belief that ACER America Corporation ("ACER") is a California corporation with a place of business at Acer Communications & Multimedia America Inc., 2641 Orchard Parkway, Bldg. #3, San Jose, California 95134. ACER has offered to sell, offers to sell, has sold and sells infringing scanners and digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to S2W-

series scanners and 300-series digital cameras.

14. Plaintiffs allege on information and belief that Acer Communications & Multimedia, Inc. ("Acer C&M") is a foreign corporation with a place of business at 157 Shan-Ying Road, Gueishan, Taoyuan 333, Taiwan. Acer C&M has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to S2W-series scanners.

15. Plaintiffs allege on information and belief that Achiever Industries Limited ("Achiever") is a foreign corporation with a place of business at 12/F., Union Hing Yip Fty. Bldg., 20 Hing Yip Street, Kwun Tong, Kowloon, Hong Kong. Achiever has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to ADC 65 digital cameras.

16. Plaintiffs allege on information and belief that Aevermann Software GmbH ("Aevermann") is a foreign corporation with a place of business at Heyerweg 7, 35394 Giessen, Germany. Aevermann has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Eclipse Imaging software.

17. Plaintiffs allege on information and belief that AGFA Corporation ("AGFA") is a Delaware corporation with a place of business at 100 Challenger Road, Ridgefield Park, New Jersey 07660-2199. AGFA has offered to sell, offers to sell, has sold and sells infringing scanners and infringing digital cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to SnapScan, Arcus, DuoScan and Pro Scan scanners and ePhoto cameras.

18. Plaintiffs allege on information and belief that Aiptek Incorporated ("Aiptek") is a California corporation with a place of business at 51 Discovery, Suite 100, Irvine, California 92618. Aiptek has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Hyper V cam mobile, Hyper V cam home and ScanCam Flex digital cameras.

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19. Plaintiffs allege on information and belief that Alchemy Mindworks, Inc. ("Alchemy") is a foreign corporation with a place of business at P.O. Box 500, Beeton, Ontario, Canada L0G 1A0. Alchemy has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Graphic Workshop.

20. Plaintiffs allege on information and belief that Alpar International Corporation ("Alpar") is a Tennessee corporation with a place of business at 11012 Flotilla Drive, Knoxville, TN 37922. Alpar has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to CiV software.

21. Plaintiffs allege on information and belief that Amplex Corporation ("Amplex") is a Connecticut corporation with a place of business at 53 Railroad Avenue, Box #7, Southington, Connecticut 06489. Amplex has offered to sell, offers to sell, has sold and sells infringing color reproduction systems in the United States and in this judicial district, including but not limited to the SPI-990 Digital Printer Processor.

22. Plaintiffs allege on information and belief that Ansco, Inc. ("Ansco") is a Delaware corporation with a place of business at 1801 Touhy Avenue, Elk Grove Village, Illinois 60007-5313. Ansco has offered to sell, offers to sell, has sold and sells infringing cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to DigiPIX cameras.

23. Plaintiffs allege on information and belief that Antec, Inc. ("Antec") is a California corporation with a place of business at 47900 Fremont Blvd., Fremont, California 94538. Antec has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to Attache USB scanners.

24. Plaintiffs allege on information and belief that Application Techniques, Inc. (aka "Aptec") is a Massachusetts corporation with a place of business at 10 Lomar Park Dr., Pepperell, Massachusetts 01463. Aptec has offered to sell, offers to sell, has sold and sells infringing software in

the United States and in this judicial district, including but not limited to Capture Eze Pro.

25. Plaintiffs allege on information and belief that ArcSoft, Inc. ("ArcSoft") is a California corporation with a place of business at 46601 Fremont Boulevard, Fremont, California 94538. ArcSoft has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Photo Studio, Photo Suite 2.0, PhotoPrinter, Panorama Maker, Photo Impression, PhotoBase and Imaging Suite.

26. Plaintiffs allege on information and belief that Argus Cameras, Inc. ("Argus") is a Delaware corporation with a place of business at 1100 Howard St., Elk Grove Village, Illinois 60007. Argus has offered to sell, offers to sell, has sold and sells infringing cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to DC-series cameras.

27. Plaintiffs allege on information and belief that Artronix Technology, Inc. ("Artronix") is a California corporation with a place of business at 350 Ranger Ave. #C, Brea, California 92821. Artronix has offered to sell, offers to sell, has sold and sells infringing scanners bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Ultima scanners.

28. Plaintiffs allege on information and belief that Autologic Information International, Inc. ("Autologic") is a Delaware corporation with a place of business at 1050 Rancho Conejo Blvd., Thousand Oaks, California 91320-1794. Autologic has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to APS Scan 3000 and 5000 series scanners bundled with Scannit software.

29. Plaintiffs allege on information and belief that Aver Software Technologies Ltd. ("Aver") is a foreign company with a place of business at Aver House, B-26, Near Monginies Factory, New Link Road, Andhri (W), Mumbai-400053, India. Aver has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Aver Magic Pro and Aver Magic software.

30. Plaintiffs allege on information and belief that Avision Labs, Inc. ("Avision") is a California corporation with a place of business at 6815 Mowry Ave., Newark, California 94560. Avision has offered to sell, offers to sell, has sold and sells infringing scanners bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Ulead ImagePals 2 Go! scanners.

31. Plaintiffs allege on information and belief that Aztek, Inc. ("Aztek") is a California corporation with a place of business at 23 Spectrum Pointe #209, Lake Forest, California 92630. Aztek has offered to sell, offers to sell, has sold and sells infringing software, scan servers and scanners bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Digital PhotoLab software and Plateau Flatbed and Digital PhotoLab Wide Format scanners.

32. Plaintiffs allege on information and belief that Benq, Inc. ("Benq") is a foreign corporation with a place of business at 157 Shan-Ying Road, Gueishan, Taoyuan 333, Taiwan, R.O.C. Benq has offered to sell, offers to sell, has sold and sells infringing scanners and digital cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to 5300U scanners, each bundled with Ulead Photo Express, and 300 mini and DC300 digital cameras, each bundled with Image Folio.

33. Plaintiffs allege on information and belief that Better Light, Inc. ("Better Light") is a California corporation with a place of business at 1200 Industrial Road, Unit 17, San Carlos, California 94070. Better Light has offered to sell, offers to sell, has sold and sells infringing scanners and digital cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to cameras and scanners bundled with ViewFinder software.

34. Plaintiffs allege on information and belief that Binuscan, Inc. ("Binuscan") is a New York corporation with a place of business at 437 Ward Ave., Suite 101, Mamaroneck, New York 10543. Binuscan has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Watch & Smile.

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35. Plaintiffs allege on information and belief that Blackboard Software, Inc. ("Blackboard") is a Colorado corporation with a place of business at P.O. Box 745494, Arvada, Colorado 80006. Blackboard has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Eye See software.

36. Plaintiffs allege on information and belief that Boomerang Software, Inc. ("Boomerang") is a Massachusetts corporation with a place of business at 90 Concord Ave., Belmont, Massachusetts 02478. Boomerang has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Internet Design Shop Gold.

37. Plaintiffs allege on information and belief that Buy.com, Inc. ("Buy.com") is a Delaware corporation with a place of business at 85 Enterprise, Aliso Viejo, California 92656. Buy.com has offered to sell, offers to sell, has sold and sells infringing scanners, cameras and software bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Visioneer PhotoPort 7700 USB Flatbed Scanners, each bundled with MGI PhotoSuite; SiPix SC-2100 cameras, each bundled with MGI PhotoSuite; and MGI PhotoSuite software.

38. Plaintiffs allege on information and belief that Cadlink Technology Corporation ("Cadlink") is a Delaware corporation with a place of business at 500 Main Street, Clinton, MA 01510. Cadlink has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Signlab software.

39. Plaintiffs allege on information and belief that Caldera Graphics ("Caldera") is a foreign company with a place of business at BP 94, 25 Boulevard Wilson, 67067 Strasbourg Cedex, France. Caldera has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Cameleo software.

40. Plaintiffs allege on information and belief that Casio, Inc. ("Casio") is a New York

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corporation with a place of business at 570 Mt. Pleasant Avenue, Dover, New Jersey 07801. Casio has offered to sell, offers to sell, has sold and sells infringing cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to QV-2300, QV-3500, QV-2900 and QV-2800 cameras.

41. Plaintiffs allege on information and belief that CDH Productions ("CDH") is a North Carolina corporation with a place of business at 296 Captain Beam Blvd., Hampstead, NC 28443. CDH has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Image Explorer Pro software.

42. Plaintiffs allege on information and belief that Cerious Software, Inc. ("Cerious") is a North Carolina corporation with a place of business at 1515 Mockingbird Lane, Suite 1000, Charlotte, North Carolina 28209. Cerious has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to ThumbsPlus.

43. Plaintiffs allege on information and belief that Circuit City Stores, Inc., ("Circuit City") is a Delaware corporation with its corporate headquarters at 9950 Mayland Drive, Richmond, Virginia 23233, doing business in this judicial district at 3300 N Central Expressway, Plano, Texas 75074. Circuit City has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with infringing image editing software in the United States and in this judicial district, including but not limited to Olympus cameras bundled with Camedia Master software and Sony cameras bundled with MGI PhotoSuite.

44. Plaintiffs allege on information and belief that Club Photo, Inc. ("Club") is a California corporation with a place of business at 650 Saragota Ave., San Jose, California 95129. Club has offered to sell, offers to sell, has sold and sells access to infringing color image editing services in the United States and in this judicial district, including but not limited to Living Album 2000 and Album To Go.

45. Plaintiffs allege on information and belief that ColorByte Software ("ColorByte") is a Florida company with a place of business at 10004 N. Dale Mabry Hwy., Suite 101, Tampa, Florida

33618. ColorByte has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Trident 4.0 and PowerColor software.

46. Plaintiffs allege on information and belief that ColorGATE Corporation ("ColorGate") is a Delaware corporation with a place of business at 176 South New Middletown Road, Suite 202, Media, Pennsylvania 19063. ColorGate has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to ColorGATE software.

47. Plaintiffs allege on information and belief that ColorVision, Inc., a Division of Datacolor ("ColorVision"), is a Delaware corporation with a place of business at 5 Princess Road, Lawrenceville, New Jersey 08648. ColorVision has offered to sell, offers to sell, has sold and sells infringing hardware and software in the United States and in this judicial district, including but not limited to Spyder and the related bundled software OptiCAL, PhotoCAL and ProfilerPLUS.

48. Plaintiffs allege on information and belief that CompUSA, Inc. ("CompUSA") is a Delaware corporation with its corporate headquarters at 14591 N Dallas Parkway, Dallas, Texas 75240, doing business in this judicial district at 721 Central Expressway Collin Creek Village, Plano, Texas 75075-8918. CompUSA has offered to sell, offers to sell, has sold and sells infringing computer systems, digital cameras, scanners and image editing software in the United States and in this judicial district, including but not limited to Sony VAIO computers; Aiptek, Nikon and Olympus digital cameras; Mictroteck, Pacific Image, Umax and Visioneer scanners; and MGI PhotoSuite, CorelDRAW, Corel PHOTO PAINT and JASC Paint Shop Pro software.

49. Plaintiffs allege on information and belief that Computerinsel GmbH ("Computerinsel") is a foreign corporation with a place of business at Zur Limestherme 4, D-93333 Bad Gögging, Germany. Computerinsel has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to PhotoLine 32 software.

50. Plaintiffs allege on information and belief that Computer Link, Inc. ("Computer

Link") is a Texas corporation with a place of business at 721 Spruce Tree, Texarkana, Texas 75501. Computer Link has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Corel PHOTO PAINT and CorelDRAW.

51. Plaintiffs allege on information and belief that Concord Camera Corporation ("Concord") is a New Jersey corporation with a place of business at 4000 Hollywood Boulevard, Hollywood, Florida 33021. Concord has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to EyeQ digital cameras.

52. Plaintiffs allege on information and belief that Contex Scanning Technology, Inc. ("Contex") is a California corporation with a place of business at 3200 Inland Empire Blvd, Suite 160, Ontario, California 91764. Contex has offered to sell, offers to sell, has sold and sells infringing color image editing scanners and software in the United States and in this judicial district, including but not limited to WIDE Image scanners and software.

53. Plaintiffs allege on information and belief that Corel Corporation ("Corel") is a Delaware corporation with a place of business at 1600 Carling Avenue, Ottawa, Ontario K1Z 8R7. Corel has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to CorelDRAW, Corel PHOTO-PAINT, Corel PRINT HOUSE and Corel VENTURA.

54. Plaintiffs allege on information and belief that Cosmi Corporation ("Cosmi") is a California corporation with a place of business at 2600 Homestead Place, Rancho Dominguez, California 90220. Cosmi has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Photo Editor Plus.

55. Plaintiffs allege on information and belief that Costco Wholesale Corporation ("Costco") is a Washington corporation with a place of business at 999 Lake Drive, Issaquah, Washington 98027. Costco has offered to sell, offers to sell, has sold and sells infringing digital

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cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Nikon CoolPix digital cameras and Olympus digital cameras bundled with Camedia Master software.

56. Plaintiffs allege on information and belief that The CPDI Group ("CPDI") is an Arizona company with a place of business at 7454 E. Broadway, Suite 102, Tucson, AZ 85710. CPDI has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Satori PhotoXL v2.29.

57. Plaintiffs allege on information and belief that CursorArts Company ("CursorArts") is an Oregon corporation with a place of business at 64660 Bend Redmond Hwy., Bend, Oregon 97701. CursorArts has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to ImageForge PRO software.

58. Plaintiffs allege on information and belief that Dell Computer Corporation ("Dell") is a Delaware corporation with a place of business at One Dell Way, Round Rock, Texas 78682. Dell has offered to sell, offers to sell, has sold and sells infringing computer systems bundled with scanners and color image editing software in the United States and in this judicial district, including but not limited to Dimension computer systems.

59. Plaintiffs allege on information and belief that Deneba Systems, Inc. ("Deneba") is a Florida corporation with a place of business at 1150 NW 72nd Avenue, Executive Tower 1, Suite 180, Miami, Florida 33126. Deneba has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Canvas.

60. Plaintiffs allege on information and belief that Digital Now Plus, Inc. ("Digital Now") is a Delaware corporation with a place of business at 8401 Old Courthouse Road, Suite 130, Vienna, VA 22182-3820. Digital Now has offered to sell, offers to sell, has sold and sells infringing software and film scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to Digital Photo Factory System and My AlbumsNow.

61. Plaintiffs allege on information and belief that Digital Portal Incorporated ("Digital Portal") is a Delaware corporation with a place of business at 111 Java Drive, Sunnyvale, California 94089. Digital Portal has offered to sell, offers to sell, has sold and sells infringing color reproduction systems in the United States and in this judicial district, including but not limited to DKS Digital Minilab 750, DKS Digital Minilab 1500, Digital Photo Kiosk and Digital Photo Kiosk II.

62. Plaintiffs allege on information and belief that Digital River, Inc. ("Digital River") is a Delaware corporation with a place of business at 9625 West 76th Street, Suite 150, Eden Prairie, Minnesota 55344. Digital River has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Satori PhotoXL v2.29.

63. Plaintiffs allege on information and belief that E-Book Systems, Inc. ("E-Book") is a California corporation with a place of business at 1500 Wyatt Drive, Suite 15, Santa Clara, California 95054. E-Book has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to FlipAlbum.

64. Plaintiffs allege on information and belief that Electronics Boutique of America, Inc. ("Electronics Boutique") is a Pennsylvania corporation with a place of business at 931 South Matlack Street, West Chester, Pennsylvania 19382. Electronics Boutique has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Ezonics EZ MegaCam Cameras.

65. Plaintiffs allege on information and belief that Element 5, Inc. ("Element 5") is a Delaware corporation with a place of business at Chapel Hill Professional Center, Suite 1800, Greenburg, PA 15601-8019. Element 5 has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to iView Media Pro, Focus Photo Editor and Picmaster software.

66. Plaintiffs allege on information and belief that Express Digital Graphics, Inc. ("Express") is a Colorado corporation with a place of business at 6675 South Kenton Street, Suite 118, Englewood, Colorado 80111. Express has offered to sell, offers to sell, has sold and sells infringing

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color image editing software in the United States and in this judicial district, including but not limited to ExpressPhoto PC and PhotoReflect software.

67. Plaintiffs allege on information and belief that Extensis Products Group ("Extensis") is an Oregon corporation with a place of business at 1800 SW First Avenue, Suite 500, Portland, Oregon 97201. Extensis has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Intellihance Pro software.

68. Plaintiffs allege on information and belief that Ezonics Corporation ("Ezonics") is a California corporation with a place of business at 5870 Stoneridge Drive, Suite #4, Pleasanton, California 94588. Ezonics has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to EZMega Cam.

69. Plaintiffs allege on information and belief that Firehand Technologies Corporation ("Firehand") is an Oklahoma corporation with a place of business at 7757 S. Jamestown Ave., Tulsa, OK 74136. Firehand has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Ember Millennium software.

70. Plaintiffs allege on information and belief that Form & Vision GmbH ("Form") is a foreign corporation with a place of business at Eclipse Team, Kettenhofweg 12, 60325 Frankfurt/Main, Germany. Form has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Eclipse Imaging Software.

71. Plaintiffs allege on information and belief that Fotoware A.S. ("Fotoware") is a foreign corporation with a place of business at Lille Grensen 5, N-0159 Oslo, Norway. Fotoware has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to FotoStation and FotoStation Pro.

72. Plaintiffs allege on information and belief that Fry's Electronics, Inc. ("Fry's") is a

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California corporation with a place of business at 600 E. Brokaw Road, San Jose, California 95112. Fry's has offered to sell, offers to sell, has sold and sells infringing software, computers, scanners and cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Sony Vaio FXA47 and MSX10 computers, each bundled with Arcsoft PhotoPrinter 2000 Pro; Visioneer PhotoPort 7700 USB Flatbed Scanners, each bundled with MGI PhotoSuite III SE; Sony Mavica MVC-CD300 cameras, each bundled with MGI PhotoSuite software; and MGI PhotoSuite software.

73. Plaintiffs allege on information and belief that Fujitsu Computer Products of America, Inc. ("Fujitsu") is a California corporation with a place of business at 2904 Orchard Parkway, San Jose, California 95134-2009. Fujitsu has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to ScanPartner fi-4110CU, 620C, 93GX, 15C and 3091DC scanners.

74. Plaintiffs allege on information and belief that GIC Technology, Inc. ("GIC") is a Massachusetts corporation with a place of business at 2F, No.11, Lane 28, Huan Shen Rd., Taipei, Taiwan 114, R.O.C. GIC has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to IMS Shell and IMS Enhancer.

75. Plaintiffs allege on information and belief that Graphic Enterprises of Ohio, Inc. ("GEI") is an Ohio corporation with a place of business at 3874 Highland Park NW, North Canton, OH 44720. GEI has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Poster Zoomer software.

76. Plaintiffs allege on information and belief that Graphics One, LLC ("Graphics One") is a California corporation with a place of business at 717 North Victory Blvd., Burbank, California 91502. Graphics One has offered to sell, offers to sell, has sold and sells infringing scanners bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to cPix 2400 and ArtixScan scanners bundled with Silverfast software.

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77. Plaintiffs allege on information and belief that Greenstreet Corporation (aka GST Technology Ltd. and Greenstreet Software Ltd.) ("Greenstreet") is a foreign corporation with a place of business at 8 Huntingdon Street, St. Noets Huntingdon, Cambridgeshire, UK PE17 4 LG . Greenstreet has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to PhotoFX and Publisher.

78. Plaintiffs allege on information and belief that Gretag Imaging, Inc. ("Gretag") is a Massachusetts corporation with a place of business at 361 Whitney Avenue, Holyoke, MA 01040-2766. Gretag has offered to sell, offers to sell, has sold and sells infringing color reproduction systems in the United States and in this judicial district, including but not limited to Master Flex D 1800 and Telepix Digital Photo Station.

79. Plaintiffs allege on information and belief that GTCO CalComp, Inc. ("GTCO") is a Maryland corporation with a place of business at 7125 Riverwood Drive, Columbia, MD 21046-2503. GTCO has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to ScanPlus III and ScanPlus IV scanners.

80. Plaintiffs allege on information and belief that Guildsoft Ltd. ("Guildsoft") is a foreign corporation with a place of business at The Software Centre, East Way, Lee Mill Industrial Estate, Ivybridge, Devon, UK, PL21 9GE. Guildsoft has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Professor Franklin's Instant Photo Effects and Presto! Mr. Photo Gold software.

81. Plaintiffs allege on information and belief that Hamrick Software ("Hamrick") is an Arizona corporation with a place of business at 4025 E. Chandler Blvd., #70-F16, Phoenix, Arizona 85048. Hamrick has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to VuePrint.

82. Plaintiffs allege on information and belief that Hemera Technologies ("Hemera") is a foreign company with a place of business at P.O. Box 79093 Hull, Quebec, Canada J8Y 6V2. Hemera has offered to sell, offers to sell, has sold and sells infringing color image editing software in the

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United States and in this judicial district, including but not limited to Party Kit and Photo Editor software.

83. Plaintiffs allege on information and belief that Howtek, Inc. ("Howtek") is a Delaware corporation with a place of business at 21 Park Avenue, Hudson, NH 03051. Howtek has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software and infringing color reproduction systems in the United States and in this judicial district, including but not limited to HiResolve scanners and Fotofunnel minilabs.

84. Plaintiffs allege on information and belief that HP Marketing Corporation ("HP Marketing") is a New Jersey corporation with a place of business at 16 Chapin Road, Pine Brook, New Jersey 07058. HP Marketing has offered to sell, offers to sell, has sold and sells digital cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Kaiser Scando dyn A+ cameras.

85. Plaintiffs allege on information and belief that Idruna Software, Inc. ("Idruna") is a California corporation with a place of business at 5663 Balboa Avenue, #407, San Diego, California 92111. Idruna has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Photogenics.

86. Plaintiffs allege on information and belief that Imacon, Inc. ("Imacon") is a Texas corporation with a place of business at 15207 N.E. 95th Street, Redmond, WA 98052-2562. Imacon has offered to sell, offers to sell, has sold and sells infringing scanners and digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to Flextight 848, Precision III, Photo, Progression III and Progression II series scanners, and FlexFrame 3020 and 4040 digital cameras.

87. Plaintiffs allege on information and belief that ImageWare Systems, Inc. ("ImageWare") is a California corporation with a place of business at 10883 Thornmint Road, San Diego, California 92127. ImageWare has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to PhotoRecall Deluxe, PC Pro and PDI School Days software.

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88. Plaintiffs allege on information and belief that Imaging Technologies Corporation ("ITEC") is a Delaware corporation with a place of business at 15175 Innovation Drive, San Diego, California 92128-3401. ITEC has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to ColorBlind Edit, ColorBlind Professional and ColorBlind Matchbox Suites software.

89. Plaintiffs allege on information and belief that Imapro 2000, Inc. ("Imapro") is a foreign corporation with a place of business at 2400 St. Laurent Blvd, Ottawa, Ontario, Canada, K1G 6C4. Imapro has offered to sell, offers to sell, has sold and sells infringing software and scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to QCS-3200 Flatbed scanner, drum scanners and FotoPro 200 Plus workstation.

90. Plaintiffs allege on information and belief that International Microcomputer Software, Inc. ("IMSI") is a California corporation with a place of business at 75 Rowland Way, Novato, California 94945. IMSI has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Hijaak Pro and Master Clips Print Workshop Premier.

91. Plaintiffs allege on information and belief that Invention Office RG ("Invention Office") is a foreign corporation upon information and belief to have a place of business at kv.7, d.8, ul. Shkolnaia obl. 143390, Russia. Invention Office has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to ColorPilot software.

92. Plaintiffs allege on information and belief that Invention Pilot, Inc. ("Invention") is an Illinois corporation with a place of business at 6418 N. Richmond, 1A, Chicago, IL 60645. Invention has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to ColorPilot software.

93. Plaintiffs allege on information and belief that I/O Magic Corporation ("I/O Magic") is a Nevada corporation with a place of business at 1300 East Wakeham Avenue, Santa Ana, California 92705. I/O Magic has offered to sell, offers to sell, has sold and sells infringing scanners

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and digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to Mobil Scan scanners and MagicImage 500 and MagicImage 420 digital cameras.

94. Plaintiffs allege on information and belief that Iomega Corporation ("Iomega") is a Delaware corporation with a place of business at 4435 Eastgate Mall, San Diego, California 92121. Iomega has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Fotoshow software.

95. Plaintiffs allege on information and belief that iView Multimedia Ltd. ("iView") is a foreign company with a place of business at 36 Cambridge Mansion, Cambridge Road, London SW11 4RU. iView has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to iView Media Pro.

96. Plaintiffs allege on information and belief that IXLA USA, Inc. ("IXLA") is a Connecticut corporation with a place of business at 126 Bonifacio Place, Monterey, California 93940. IXLA has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to IXLA Photo Easy and Web Easy.

97. Plaintiffs allege on information and belief that JASC Software, Inc. ("JASC") is a Minnesota corporation with a place of business at 7905 Fuller Road, Eden Prairie, Minnesota 55344. JASC has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Paint Shop Pro.

98. Plaintiffs allege on information and belief that Jetsoft Development Company (aka Jetsoft, Inc.) ("Jetsoft") is an Ohio corporation with a place of business at 629 Old State Route #74, Suite #1, Cincinnati, Ohio 45244. Jetsoft has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Art-Scan, Art-Copy and Digital Office Scanner Tools.

99. Plaintiffs allege on information and belief that JOBO Labortechnik GmbH & Co. KG ("Jobo") is a foreign corporation with a place of business at Kölner Straße 58, 51645 Gummersbach,

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Germany. Jobo has offered to sell, offers to sell, has sold and sells infringing scanners bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Jobo Imagescan and Proscan scanners bundled with Jobo scanVision software.

100. Plaintiffs allege on information and belief that J&R Electronics, Inc. ("J&R") is a New York corporation with a place of business at 23 Park Row, New York, NY 10038. J&R has offered to sell, offers to sell, has sold and sells infringing software, computers, scanners and cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Sony Vaio PCV-RX640 computers, each bundled with ArcSoft PhotoPrinter 2000 Pro; Visioneer PhotoPort 7700 USB Flatbed Scanners, each bundled with MGI PhotoSuite III SE; Sony CyberShot DSC-P5 cameras, each bundled with MGI PhotoSuite; and MGI PhotoSuite software.

101. Plaintiffs allege on information and belief that Kaiser Fototechnik GmbH & Co. KG ("Kaiser") is a foreign corporation with a place of business at P.O. Box 1262, D-74711 Buchen, Germany. Kaiser has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to Scando dyn A+ digital cameras.

102. Plaintiffs allege on information and belief that KB Gear, Inc. (aka KB Gear Interactive) ("KB") is a Minnesota corporation with a place of business at 10250 Valley View Road, Suite 137, Eden Prairie, Minnesota 55344. KB has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to JamCam cameras.

103. Plaintiffs allege on information and belief that Kis / Photo-Me Group ("Kis") is a foreign company with a place of business at 2110, avenue du Général de Gaulle, 38 130 Echirolles, France. Kis has offered to sell, offers to sell, has sold and sells infringing color reproduction systems in the United States and in this judicial district, including but not limited to DKS 750.

104. Plaintiffs allege on information and belief that Kyocera International, Inc. ("Kyocera") is a California corporation with a place of business at 8611 Balboa Avenue, San Diego,

California 92123-1580. Kyocera has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to Yashica Finecam S3 digital cameras.

105. Plaintiffs allege on information and belief that Kyocera Optics, Inc. ("Kyocera Optics") is a New York corporation with a place of business at 2301-200 Cottontail Lane, Somerset, NJ 08873-1245. Kyocera Optics has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to Yashica Finecam S3 digital cameras.

106. Plaintiffs allege on information and belief that LandofCom Software ("LandofCom") is a Minnesota corporation with a place of business at 17845 211th Ave., Big Lake, MN 55309. LandofCom has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Elf Image Editor software.

107. Plaintiffs allege on information and belief that Largan, Inc. ("Largan") is an Arizona corporation with a place of business at 2432 W. Peoria, Suite 1166, Phoenix, Arizona 85029. Largan has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to Chameleon, Chameleon Slim and Chameleon Mega digital cameras.

108. Plaintiffs allege on information and belief that LaserSoft Imaging, Inc. ("LaserSoft") is a Florida corporation with a place of business at 546 Bay Isles Road, Longboat Key, FL 34228. LaserSoft has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to SilverFast software.

109. Plaintiffs allege on information and belief that LEAD Technologies, Inc. ("LEAD") is a North Carolina corporation with a place of business at 1201 Greenwood Cliff, Suite 400, Charlotte, North Carolina 28204. LEAD has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Image Viewer.

110. Plaintiffs allege on information and belief that Legasys International ("Legasys") is a

Colorado corporation with a place of business at 580 Burbank Street, Suite 110, Bloomfield, Colorado 80020. Legasys has offered to sell, offers to sell, has sold and sells infringing software in the United States and in this judicial district, including but not limited to Caldera Cameleo software.

111. Plaintiffs allege on information and belief that Leica Camera AG ("Leica") is a foreign corporation with a place of business at Oskar-Barnack-Straße 11, D-35606 Solms, Germany. Leica has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to Leica Digilux digital cameras.

112. Plaintiffs allege on information and belief that Lexar Media, Inc. ("Lexar") is a Delaware corporation with a place of business at 47421 Bayside Parkway, Fremont, California 94538. Lexar has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Shoot & Share software.

113. Plaintiffs allege on information and belief that Linker Systems, Inc. ("Linker") is a California corporation with a place of business at 13612 Onkayha Circle, Irvine, California 92620. Linker has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Animation Stand.

114. Plaintiffs allege on information and belief that Macmillan Software (aka Macmillan USA, Macmillan Publishing) ("Macmillan") is a Maryland corporation with a place of business at 201 West 103rd St., Indianapolis, Indiana 46290-1097. Macmillan has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Picture This!, Publish It!, Imagine It! and Internet Design Shop.

115. Plaintiffs allege on information and belief that Macromedia, Inc. ("Macromedia") is a Delaware corporation with a place of business at 600 Townsend Street, San Francisco, California 94103. Macromedia has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Fireworks.

116. Plaintiffs allege on information and belief that Matsushita Electric Industrial Co., Ltd. ("Matsushita") is a Delaware corporation with a place of business at 1006, Kadoma City, Osaka 571-

8501, Japan. Matsushita has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to Panasonic brand and iPalm digital cameras.

117. Plaintiffs allege on information and belief that MediaChance ("MediaChance") is a foreign company with a place of business at PMB 201, 10820 Abbotts Bridge Rd, Suite 220, Duluth, Georgia 30097. MediaChance has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Photo-Brush.

118. Plaintiffs allege on information and belief that Media Dimensions LLC ("Media Dimensions") is a New Jersey corporation with a place of business at 186 Grandview Avenue, North Caldwell, New Jersey 07006. Media Dimensions has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Satori PhotoXL.

119. Plaintiffs allege on information and belief that MEGALUX Light Technique Ltd. ("Megalux") is a foreign corporation with a place of business at 1033-H Budapest, Szõlõkert u. 5., Hungary. Megalux has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Ultimate Paint software.

120. Plaintiffs allege on information and belief that MegaVision, Inc. ("MegaVision") is a California corporation with a place of business at 5765 Thornwood Drive, Goleta, California 93117. MegaVision has offered to sell, offers to sell, has sold and sells infringing camera backs bundled with color image editing software in the United States and this judicial district, including but not limited to camera backs bundled with PhotoShoot software.

121. Plaintiffs allege on information and belief that Memtek Products, Inc. ("Memtek") is a California corporation with a place of business at 10100 Pioneer Blvd., Santa Fe Springs, California 90670. Memtek has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited

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to Memorex 6136U, 6142U, SCF 3600P, SCF 6120P, SCF 9360P and SCF 9612 scanners.

122. Plaintiffs allege on information and belief that MGI Software Corporation ("MGI") is a foreign corporation with a place of business at 50 West Pearce Street, Richmond Hill, Ontario, Canada L4B 1E3. MGI has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to PhotoSuite.

123. Plaintiffs allege on information and belief that Micro Electronics, Inc. dba Micro Center – The Computer Department Store ("Micro Electronics") is a Delaware corporation with a place of business at 4119 Leap Road, Hilliard, OH 43026. Micro Electronics has offered to sell, offers to sell, has sold and sells infringing computers, scanners and cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Sony Vaio RX680G computers, each bundled with ArcSoft PhotoPrinter Pro 2000; USB scanners, each bundled with MGI PhotoSuite; and Nikon Coolpix 775 cameras, each bundled with ArcSoft PhotoPrinter Pro 2000.

124. Plaintiffs allege on information and belief that Micro Frontier Incorporated ("Micro Frontier") is an Iowa corporation with a place of business at 3401 101st Street, Suite E, Des Moines, Iowa 50322. Micro Frontier has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Digital Darkroom.

125. Plaintiffs allege on information and belief that Micrografx, Inc. ("Micrografx") is a Texas corporation with a place of business at 505 Millennium Drive, Allen, Texas 75031. Micrografx has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Picture Publisher, iGrafx Designer and Webtricity.

126. Plaintiffs allege on information and belief that Microsoft Corporation ("Microsoft") is a Washington corporation with a place of business at One Microsoft Way, Redmond, Washington 98052-6399. Microsoft has offered to sell, offers to sell, has sold and sells infringing color image

1 editing software in the United States and in this judicial district, including but not limited to Picture

2 It!, Office, Works Suite and Publisher.

3 127. Plaintiffs allege on information and belief that Microtek Lab, Inc. ("Microtek") is a

4 California corporation with a place of business at 3715 Doolittle Drive, Redondo Beach, California

5 90278. Microtek has offered to sell, offers to sell, has sold and sells infringing scanners bundled with

6 color image editing software in the United States and in this judicial district, including but not limited

7 to ScanMaker scanners.

8 128. Plaintiffs allege on information and belief that Mmedia Research Corp. ("Mmedia")

9 is a Florida corporation with a place of business at 1749 East Hallandale Beach Blvd., PMB #254,

10 Hallandale, Florida 33009. Mmedia has offered to sell, offers to sell, has sold and sells infringing

11 color image editing software in the United States and in this judicial district, including but not limited

12 to LView Pro.

13 129. Plaintiffs allege on information and belief that Multimedia 2000 Co. ("M2K") is a

14 Delaware corporation with a place of business at 2017 Eighth Avenue, 3rd Floor, Seattle, WA 98101.

15 M2K has offered to sell, offers to sell, has sold and sells infringing color image editing software in the

16 United States and in this judicial district, including but not limited to Digital Picture Perfect.

17 130. Plaintiffs allege on information and belief that Mustek, Inc. ("Mustek") is a

18 California corporation with a place of business at 121 Waterworks Way, Suite #100, Irvine California

19 92618. Mustek has offered to sell, offers to sell, has sold and sells infringing scanners and digital

20 cameras bundled with color image editing software in the United States and in this judicial district,

21 including but not limited to Be@r Paw, 1200, Plug-n-Scan 1200 UB Plus, 2400 scanners, and gSmart

22 and MDC cameras.

23 131. Plaintiffs allege on information and belief that NEC Computers, Inc. ("NEC") is a

24 Delaware corporation with a place of business at 2890 Scott Boulevard, Suite 300, P.O. Box 58155,

25 Santa Clara, California 98052-8155. NEC has offered to sell, offers to sell, has sold and sells

26 infringing computers bundled with color image editing software in the United States and in this

27 judicial district, including but not limited to MultiMedia 883, MultiMedia 880 and Platinum Supreme

28

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1952 computers.

132. Plaintiffs allege on information and belief that NeoSoft Corp. ("NeoSoft") is an Oregon corporation with a place of business at P.O. Box 5667, Bend, Oregon 97708-5667. NeoSoft has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to NeoPaint and NeoBook.

133. Plaintiffs allege on information and belief that NewSoft America, Inc. ("NewSoft") is a California corporation with a place of business at 4113 Clipper Court, Fremont, California 94538. NewSoft has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Presto! Image Folio, Presto! PageManager, Presto! Mr. Photo, Mr. Photo Gold, PhotoComposer, PhotoAlbum and PhotoDesigner.

134. Plaintiffs allege on information and belief that NewTek, Inc. ("NewTek") is a Kansas corporation with a place of business at 5131 Beckwith Blvd., San Antonio, Texas 78249. NewTek has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Aura.

135. Plaintiffs allege on information and belief that New World Software ("New World") is a foreign company with a place of business at Via Santa Maria ai Monti 84, Napoli, Napoli 80141, Italy. New World has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Focus Photo Editor 3.0 software.

136. Plaintiffs allege on information and belief that Nikon, Inc. ("Nikon") is a New York corporation with a place of business at 1300 Walt Whitman Road, Melville, New York 11747-3064. Nikon has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to CoolPix cameras.

137. Plaintiffs allege on information and belief that Noritsu America Corporation ("Noritsu") is a California corporation with a place of business at 6900 Noritsu Avenue, Buena Park, California 90620-1372. Noritsu has offered to sell, offers to sell, has sold and sells infringing color

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reproduction systems in the United States and in this judicial district, including but not limited to QSS Minilabs.

138. Plaintiffs allege on information and belief that Northstar Solutions ("Northstar") is a Kansas company with a place of business at 1228 Westloop Pl., Suite #204, Manhattan, Kansas 66502. Northstar has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Ultimate Paint.

139. Plaintiffs allege on information and belief that Nova Design, Inc. ("Nova") is a Virginia corporation with a place of business at 1910 Byrd Ave., Suite 204, Richmond, Virginia 23230. Nova has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to ImageFX.

140. Plaintiffs allege on information and belief that Nova Development Corporation ("Nova Development") is a California corporation with a place of business at 23801 Calabasas Road, Suite 2005, Calabasas, California 91302-1547. Nova Development has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Art Explosion, Art Explosion T-Shirt Factory Deluxe and Greeting Card Factory Deluxe.

141. Plaintiffs allege on information and belief that NuTrend Computer Products, Inc. ("Nutrend") is a California corporation with a place of business at 9999 E. Rose Hills Road, Whittier, California 90601. Nutrend has offered to sell, offers to sell, has sold and sells infringing computers bundled with color image editing software in the United States and in this judicial district, including but not limited to Athlon and Intrepid systems.

142. Plaintiffs allege on information and belief that NuWave Technology, Inc. ("NuWave") is an Ohio corporation with a place of business at One Passaic Avenue, Fairfield, New Jersey 07004. NuWave has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Picture Prep.

143. Plaintiffs allege on information and belief that Ofoto, Inc. ("Ofoto") is a Delaware

corporation with a place of business at 5900 Hollis Street, Suite S, Emeryville, California 94608. Ofoto has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Ofoto Now 2.1.

144. Plaintiffs allege on information and belief that Olympus America, Inc. ("Olympus") is a New York corporation with a place of business at 2 Corporate Center Drive, Melville, New York 11747-3157. Olympus has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to cameras (including the C-4040, C-3000 ZOOM, C-7000UZ, D 510 and D 370 models) bundled with Camedia Master software.

145. Plaintiffs allege on information and belief that Pacific Image Electronics, Inc. (aka P.I.E.) ("Pacific") is a California corporation with a place of business at 1830 West 208th Street, Torrance, California 90501. Pacific has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to Scan Ace and Magic Keys flatbed scanners.

146. Plaintiffs allege on information and belief that PandaSoft ("Panda") is a foreign company with a place of business at BP 61, 59009 Lille Cedex, France. Panda has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Adesign software.

147. Plaintiffs allege on information and belief that Pegasus Imaging Corporation ("Pegasus") is a Florida corporation with a place of business at 4522 Spruce Street, Suite 200, Tampa, Florida 33607. Pegasus has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Image Xpress.

148. Plaintiffs allege on information and belief that PENTACON GmbH, ("Pentacon") is a foreign corporation with a place of business at Foto-und Feinwerktechnik, Enderstr.94, D-01277 Dresden. Pentacon has offered to sell, offers to sell, has sold and sells infringing cameras bundled with infringing color image editing software in the United States and in this judicial district, including

but not limited to Praktica cameras bundled with Silverfast software.

149. Plaintiffs allege on information and belief that Pentax Corporation ("Pentax") is a Delaware corporation with a place of business at 35 Inverness Drive East, Englewood, CO 80112. Pentax has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to Optio 330 and 430 digital cameras.

150. Plaintiffs allege on information and belief that Phase One United States, Inc. ("Phase One") is a New York corporation with a place of business at 24 Woodbine Avenue, Suite 15, Northport, New York 11768. Phase One has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Phase One Image Capture software.

151. Plaintiffs allege on information and belief that Photodex Corporation ("Photodex") is a Texas corporation with a place of business at 1106 Clayton Lane, #440W, Austin, Texas 78723. Photodex has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to CompuPic Pro.

152. Plaintiffs allege on information and belief that PhotoWorks, Inc ("PhotoWorks") is a Washington corporation with a place of business at 1240 16th Avenue West, Seattle, Washington 98119. PhotoWorks has offered to sell, offers to sell, has sold and sells infringing color image editing software, including but not limited to PhotoWorks Plus and Pictures on CD (which included MGI PhotoSuite). Photoworks also has offered to sell, offers to sell, has sold and sells access to infringing color image editing services in the United States and in this judicial district, including but not limited to PhotoWorks.

153. Plaintiffs allege on information and belief that PicMaster ("PicMaster") is a foreign company with a place of business at Cicerostr. 14, 10709 Berlin, Germany. PicMaster has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to PicMaster software.

154. Plaintiffs allege on information and belief that PierreSoft ("PierreSoft") is a foreign

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company with a place of business at Bel Air, Saint Sauveur, Rhone-Alpes 38 160, France. PierreSoft has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Adesign software.

155. Plaintiffs allege on information and belief that Pixel Magic Imaging, Inc. ("Pixel Magic") is a Delaware corporation with a place of business at 631 Mill Street, San Marcos, Texas 78666. Pixel Magic has offered to sell, offers to sell, has sold and sells infringing color reproduction systems in the United States and in this judicial district, including but not limited to Photo Ditto Minilabs.

156. Plaintiffs allege on information and belief that Plustek USA, Inc. ("Plustek") is a California corporation with a place of business at 169 Pullman Street, Livermore, California 94550. Plustek has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to OpticPro series of scanners.

157. Plaintiffs allege on information and belief that Polaroid Corporation ("Polaroid") is a Delaware corporation with a place of business at 784 Memorial Drive, Cambridge, Massachusetts 02139. Polaroid has offered to sell, offers to sell, has sold and sells infringing cameras and color image editing software in the United States and in this judicial district, including but not limited to Photo Max cameras and Photo Max Image Maker software.

158. Plaintiffs allege on information and belief that PolyBytes ("PolyBytes") is an Iowa company with a place of business at 3427 Bever Avenue SE, Cedar Rapids, Iowa 52403-3161. PolyBytes has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Polyview software.

159. Plaintiffs allege on information and belief that Polywell Company, Inc. ("Polywell") is a California corporation with a place of business at 1461 San Mateo Ave., South San Francisco, California 94080. Polywell has offered to sell, offers to sell, has sold and sells infringing computer systems bundled with scanners and color image editing software in the United States and in this judicial district, including but not limited to Poly 880K7-1000 and Poly AV8600B7.

160. Plaintiffs allege on information and belief that PrimaScan ("PrimaScan") is a foreign company with a place of business at 5673 Gibraltar Drive, Suite 150, Pleasanton, California 94588. PrimaScan has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to Colorado series scanners.

161. Plaintiffs allege on information and belief that PrimaxAmerica ("PrimaxAmerica") is a foreign company with a place of business at 34800 Campus Drive, Fremont, California 94555. PrimaxAmerica has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to Primax G-series and Colorado scanner models 600P, 1200P, USB 9600 and USB 19200.

162. Plaintiffs allege on information and belief that Primax Electronics Ltd. ("Primax") is a foreign company with a place of business at No. 669, Ruey Kuang Road, Neihu, Taipei, Taiwan. Primax has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to Primax G-series and Colorado scanner models 600P, 1200P, USB 9600 and USB 19200.

163. Plaintiffs allege on information and belief that Printroom.com, a business unit of Lexar Media, Inc. ("Printroom") is a Delaware corporation with a place of business at 47421 Bayside Parkway, Fremont, California 94538. Printroom has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Shoot & Share software.

164. Plaintiffs allege on information and belief that Purup-Eskofot, Inc. ("Purup") is a Georgia corporation with a place of business at 500 TownPark Lane, Suite 250, Kennesaw, GA 30144. Purup has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to Scanmate scanners.

165. Plaintiffs allege on information and belief that QBeo Inc. ("QBeo") is a Washington corporation with a place of business at P.O. Box 689, 209 Main Ave. S., Suite 103, North Bend,

Washington 98045. QBeo has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to PhotoGenetics.

166. Plaintiffs allege on information and belief that RCA ("RCA") is a Delaware corporation with a place of business at 10330 North Meridian Street, Indianapolis, Indiana 46290-1976. RCA has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to CDS-series cameras.

167. Plaintiffs allege on information and belief that Register Now! (aka RegNow, RegNow.com) ("RegNow") is a Washington company with a place of business at P.O. Box 1816, Issaquah, Washington 98027. RegNow has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to ColorPilot software.

168. Plaintiffs allege on information and belief that RegSoft.com, Inc. ("RegSoft") is a Georgia company with a place of business at PMB 201, 10820 Abbotts Bridge Road, Suite 220, Duluth, Georgia 30097. RegSoft has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to PhotoBrush software.

169. Plaintiffs allege on information and belief that RFX, Inc. ("RFX") is a California corporation with a place of business at 736 Seward Street, Hollywood, California 90038-3504. RFX has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Satori PhotoXL v2.29.

170. Plaintiffs allege on information and belief that RL Vision ("RL") is a foreign company with a place of business at Linnégatan 9, 216 12 Limhamn, Sweden. RL has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to ArtGem.

171. Plaintiffs allege on information and belief that Roland DGA Corporation ("Roland")

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is a California corporation with a place of business at 15271 Barranca Parkway, Irvine, California 92618-2201. Roland has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to SignMate Pro software.

172. Plaintiffs allege on information and belief that Rollei Fototechnic GmbH ("Rollei") is a foreign corporation with a place of business at Salzdahlumer Strasse 196, D-38126, Braunschweig, Germany. Rollei has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to digital cameras, plus software.

173. Plaintiffs allege on information and belief that Ron Scott, Inc. ("Ron Scott") is a Texas corporation with a place of business at Ron Scott Studios, 1000 Jackson Boulevard, Houston, Texas 77006. Ron Scott has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to QFX.

174. Plaintiffs allege on information and belief that Roxio, Inc. ("Roxio") is a Delaware corporation with a place of business at 461 S. Milpitas Blvd., Milpitas, California 95035. Roxio has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to MGI PhotoSuite software.

175. Plaintiffs allege on information and belief that Samy's Camera, Inc. ("Samy's") is a California corporation with a place of business at 431 S. Fairfax Ave. Los Angeles, California 90036. Samy's has offered to sell, offers to sell, has sold and sells infringing cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Super Digital cameras bundled with Silverfast software.

176. Plaintiffs allege on information and belief that Sanyo North America Corporation ("Sanyo") is a Delaware corporation with a place of business at 2055 Sanyo Avenue, San Diego, California 92154. Sanyo has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to VPC-series cameras.

177. Plaintiffs allege on information and belief that Scanport, Inc. ("Scanport") is a California corporation with a place of business at 938 Radecki Court, Industry, California 91748. Scanport has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to Scanport 3000.

178. Plaintiffs allege on information and belief that ScanSoft, Inc. ("ScanSoft") is a Delaware corporation with a place of business at 9 Centennial Drive, Peabody, Massachusetts 01960. ScanSoft has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Photo Soap, Kai's SuperGOO, Photo Factory Suite, OmniPage Pro Scan Suite Plus, Pagis Pro Millennium Scanning Suite and PaperPort Deluxe.

179. Plaintiffs allege on information and belief that Scanvec Amiable Ltd. ("Scanvec") is a Pennsylvania corporation with a place of business at International Plaza Two, Suite 625, Philadelphia, PA 19113. Scanvec has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to FlexiSIGN-PRO, FlexiSIGN-Plus, FlexiEXPERT and FlexiDESIGNER software.

180. Plaintiffs allege on information and belief that Schneider Optics, Inc. ("Schneider") is a Delaware corporation with a place of business at 285 Oser Dr., Hauppauge, N.Y. 11788. Schneider has offered to sell, offers to sell, has sold and sells infringing cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Praktica cameras bundled with Silverfast software.

181. Plaintiffs allege on information and belief that SCM Microsystems, Inc. ("SCM") is a Delaware corporation with a place of business at 47211 Bayside Parkway, Fremont, California 94538. SCM has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Dazzle software.

182. Plaintiffs allege on information and belief that Sears, Roebuck and Company ("Sears") is a New York corporation with a place of business at 3333 Beverly Road, B5-220B,

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Hoffman Estates, Illinois 60179. Sears has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to Olympus Camedia cameras and software.

183. Plaintiffs allege on information and belief that SEITZ Phototechnik AG ("Seitz") is a foreign corporation with a place of business at Hauptstrasse 14, 8512 Lustdorf, Switzerland. Seitz has offered to sell, offers to sell, has sold and sells infringing cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Super Digital cameras bundled with Silverfast software.

184. Plaintiffs allege on information and belief that Serif, Inc. ("Serif") is a New Hampshire corporation with a place of business at The Software Center, 13 Hampshire Drive, Suite 12, Hudson, New Hampshire 03051-4948. Serif has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to PhotoPlus.

185. Plaintiffs allege on information and belief that Sierra On-Line, Inc. ("Sierra") is a Delaware corporation with a place of business at 3060 139th Avenue SE, #500 Bellevue, Washington 98005. Sierra has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to SnapShot, Print Artist Photo Expert, Hallmark Scrapbook Studio Deluxe, Complete Web Studio, Print Artist, Generations and Hallmark Card Studio.

186. Plaintiffs allege on information and belief that Sigma Pi Design, a sole proprietorship ("Sigma") is a foreign company with a place of business at Mazuranicevo setaliste 40, Split, Croatia 21000 HR. Sigma has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Pixopedia 24 software.

187. Plaintiffs allege on information and belief that Silverlab Software, Inc. ("Silverlab") is a Delaware corporation with a place of business at 307 W 38th Street, Suite 1005, New York City, NY 10018. Silverlab has offered to sell, offers to sell, has sold and sells infringing color image

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editing software in the United States and in this judicial district, including but not limited to Photo Assistant software.

188. Plaintiffs allege on information and belief that Sinar AG ("Sinar") is a foreign corporation with a place of business at Stadtweg 24, CH-8245 Feuerthalen, Switzerland. Sinar has offered to sell, offers to sell, has sold and sells infringing scanners and cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to SinarBack scanners and cameras.

189. Plaintiffs allege on information and belief that SiPix Inc. ("SiPix") is a Delaware corporation with a place of business at 1075 Montague Expressway, Milpitas, California 95035. SiPix has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to SC-2100, SC-1300, iQuest DualCam and SP-1300 Shoot & Share.

190. Plaintiffs allege on information and belief that Software Vision Corporation ("Software Vision") is a Florida corporation with a place of business at 470 12th Avenue North, St. Petersburg, Florida 33701. Software Vision has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to PhotoVision Pro.

191. Plaintiffs allege on information and belief that Sony Electronics Inc. ("Sony") is a Delaware corporation with a place of business at 1 Sony Drive, Park Ridge, New Jersey 07565. Sony has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to DSC-series and MVC-series cameras.

192. Plaintiffs allege on information and belief that Sound Vision, Inc. ("Sound") is a Massachusetts corporation with a place of business at 432 Boston Post Road (Route 20), Wayland, Massachusetts 01778. Sound has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to Svmini-2 and 209 cameras.

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1   193. Plaintiffs allege on information and belief that Spaceward Graphics Ltd.

2   ("Spaceward") is a foreign company with a place of business at Denmark House, 3b High Street,

3   Willingham, Cambridge, CB4 5ES, United Kingdom. Spaceward has offered to sell, offers to sell, has

4   sold and sells infringing color image editing software in the United States and in this judicial district,

5   including but not limited to Satori PhotoXL v2.29.

6   194. Plaintiffs allege on information and belief that SPG Inc. ("SPG") is a Florida

7   corporation with a place of business at 15505 Bull Run Road, #303, Miami Lakes, Florida 33014.

8   SPG has offered to sell, offers to sell, has sold and sells infringing color image editing software in the

9   United States and in this judicial district, including but not limited to WEB Tools 4 Pro, SPG4 Web4

10   Graphics Suite and Color Works.

11   195. Plaintiffs allege on information and belief that STOIK Software ("STOIK") is a

12   foreign company with a place of business at Mytnaya 22/1, Moscow, 117049, Russia. STOIK has

13   offered to sell, offers to sell, has sold and sells infringing color image editing software in the United

14   States and in this judicial district, including but not limited to Picture Man.

15   196. Plaintiffs allege on information and belief that Stomp, Inc. ("Stomp") is a California

16   corporation with a place of business at 1012 Brioso Dr., #105, Costa Mesa, California 92627. Stomp

17   has offered to sell, offers to sell, has sold and sells infringing color image editing software in the

18   United States and in this judicial district, including but not limited to Click 'N' Share Photo.

19   197. Plaintiffs allege on information and belief that Summitsoft Corporation

20   ("Summitsoft") is a Colorado corporation with a place of business at 10730 Pacific Street, Suite 35,

21   Omaha, Nebraska 68114. Summitsoft has offered to sell, offers to sell, has sold and sells infringing

22   color image editing software in the United States and in this judicial district, including but not limited

23   to PhotoFX and Publisher software.

24   198. Plaintiffs allege on information and belief that Sum Software ("Sum") is a foreign

25   company with a place of business at Heyendaalseweg 127 E2-08, 6525 AJ Nijmegen, The

26   Netherlands. Sum has offered to sell, offers to sell, has sold and sells infringing software in the

27   United States and in this judicial district, including but not limited to Becasso for the BeOS operating

28

1 system.

2   199. Plaintiffs allege on information and belief that Target Corporation, a division of

3 Dayton Hudson Corporation ("Target") is a Minnesota corporation with a place of business at 33

4 South Sixth Street, Minneapolis, Minnesota 55402. Target has offered to sell, offers to sell, has sold

5 and sells infringing digital cameras bundled with color image editing software in the United States and

6 in this judicial district, including but not limited to Nikon CoolPix cameras bundled with Arcsoft

7 software.

8   200. Plaintiffs allege on information and belief that Technotape USA, Inc. ("Technotape")

9 is a Delaware corporation with a place of business at 959 Columbia Street, Crete, IL 60417.

10 Technotape has offered to sell, offers to sell, has sold and sells infringing color image editing software

11 in the United States and in this judicial district, including but not limited to DPI Photo CD.

12   201. Plaintiffs allege on information and belief that TechWorks, Inc. ("TechWorks") is a

13 Delaware corporation with a place of business at 4030 W. Braker Lane, #350, Austin, Texas 78759.

14 TechWorks has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with

15 color image editing software in the United States and in this judicial district, including but not limited

16 to PowerCAM MN410 digital cameras.

17   202. Plaintiffs allege on information and belief that Tecsa Limited ("Tecsa") is a foreign

18 corporation with a place of business at DISS Business Center, DISS, Norfolk, IP21 4HD, UK. Tecsa

19 has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image

20 editing software in the United States and in this judicial district, including but not limited to TS 3000

21 and TS 5000 scanners.

22   203. Plaintiffs allege on information and belief that Telepix Imaging, Inc. ("Telepix") is a

23 foreign corporation with a place of business at TD Place, 140 Water Street, Suite 801, St. John's,

24 Newfoundland, Canada, A1C 6H6. Telepix has offered to sell, offers to sell, has sold and sells

25 infringing color image editing software in the United States and in this judicial district, including but

26 not limited to Digital Photo Station software.

27   204. Plaintiffs allege on information and belief that Thomson Multimedia, Inc.

28

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("Thomson") is an Indiana corporation with a place of business at 10330 North Meridian Street, Indianapolis, Indiana 46290-1976. Thomson has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to CDS-series cameras.

205. Plaintiffs allege on information and belief that Tiny Computers, Inc. ("Tiny") is a Washington corporation with a place of business at 6704 Tacoma Mall Blvd., Suite 111, Tacoma, Washington 98409. Tiny has offered to sell, offers to sell, has sold and sells infringing color reproduction systems, including computers bundled with scanners and/or cameras and color image editing software in the United States and in this judicial district, including but not limited to Family Photo series , TS7, TS8, TS9 and Tiny T-Bird computers.

206. Plaintiffs allege on information and belief that Tiny Computers Limited ("Tiny Limited") is a foreign corporation with a place of business at Simonstone, Lancashire, BB12 7TG, UK. Tiny Limited has offered to sell, offers to sell, sold and sells infringing color reproduction systems, including computers bundled with scanners and/or cameras and color image editing software in the United States and in this judicial district, including but not limited to Family Photo series, TS7, TS8, TS9 and Tiny T-Bird computers.

207. Plaintiffs allege on information and belief that Ulead Systems, Inc. ("Ulead") is a California corporation with a place of business at 20000 Mariner Ave, Suite #200, Torrance, California 90503. Ulead has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Photo Express and Photo Impact.

208. Plaintiffs allege on information and belief that UMAX Technologies, Inc. ("UMAX") is a California corporation with a place of business at 3561 Gateway Blvd., Fremont, California 94538. UMAX has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to Astra and PowerLook scanners.

209. Plaintiffs allege on information and belief that ValuSoft, Inc. ("ValuSoft")

is a Minnesota corporation with a place of business at 711 South Pine Street, Waconia, Minnesota 55387. ValuSoft has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to EZ Photo.

210. Plaintiffs allege on information and belief that VCW ("VCW") is a foreign company with a place of business at Minskaya St., House 3, Room 40, Moscow, 121108, Russia. VCW has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to VicMan's Photo Editor Pro software.

211. Plaintiffs allege on information and belief that Vidar Systems Corporation ("Vidar") is a Virginia corporation with a place of business at 460 Springpark Place, Herndon, Virginia 20170. Vidar has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to CopySystems software.

212. Plaintiffs allege on information and belief that Vidcom Center, Inc. ("Vidcom") is a Texas corporation with a place of business at 4207 Texas Blvd., Texarkana, Texas 75503-3518. Vidcom has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to CorelDRAW, Corel PHOTO-PAINT, Corel PRINT HOUSE and Corel VENTURA.

213. Plaintiffs allege on information and belief that Visioneer, Inc. ("Visioneer") is a California corporation with a place of business at 5673 Gibraltar Drive, Suite 150, Pleasanton, California 94588. Visioneer has offered to sell, offers to sell, has sold and sells infringing scanners bundled with color image editing software in the United States and in this judicial district, including but not limited to One Touch, Visioneer 6100, Visioneer 3100 and Photo Port 7700 USB scanners. Visioneer also sells and offers to sell infringing photo editing software, including Visioneer Scan Manager Pro.

214. Plaintiffs allege on information and belief that Vivitar Corporation ("Vivitar") is a California corporation with a place of business at 1280 Rancho Conejo Boulevard, Newbury Park, California 91320. Vivitar has offered to sell, offers to sell, has sold and sells infringing cameras bundled with color image editing software in the United States and in this judicial

district, including but not limited to V2655, V3500 and V3550 digital cameras.

215. Plaintiffs allege on information and belief that Wacom Technology Corporation ("Wacom") is a California corporation with a place of business at 1311 SE Cardinal Court, Vancouver, WA 98683. Wacom has offered to sell, offers to sell, has sold and sells infringing products bundled with color image editing software in the United States and in this judicial district, including but not limited to Graphire, Graphire2, Intuos2 and Cintiq Graphics Tablets and Pens.

216. Plaintiffs allege on information and belief that Wasatch Computer Technology, Inc. ("Wasatch") is a Utah corporation with a place of business at 333 South 300 East, Salt Lake City, Utah 84111. Wasatch has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to SoftRIP.

217. Plaintiffs allege on information and belief that Washington Computer Services ("Washington") is a New York corporation with a place of business at 155 Avenue of the Americas, New York, NY 10013. Washington has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Satori PhotoXL v2.29.

218. Plaintiffs allege on information and belief that WorkFlow Imaging ("WorkFlow") is a California corporation with a place of business at 30100 Crown Valley Parkway, Suite 17, Laguna Niguel, California 92677. WorkFlow has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to FotoStation and FotoStation Pro software.

219. Plaintiffs allege on information and belief that World Office Products Manufacturing, Inc. ("World") is a Florida corporation with a place of business at 6073 Northwest 167th Street, C-5, Miami, Florida 33015. World has offered to sell, offers to sell, has sold and sells infringing digital cameras bundled with color image editing software in the United States and in this judicial district, including but not limited to ADC 65 digital cameras.

220. Plaintiffs allege on information and belief that Wright Technologies (Canada) Ltd. ("Wright - Canada") is a foreign company with a place of business at 2300 Yonge Street, Suite 1104,

P.O. Box 2366, Toronto, Ontario, Canada M4P 1E4. Wright - Canada has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Wright Photo 2.1.

221. Plaintiffs allege on information and belief that Wright Technologies Pty Ltd. ("Wright") is a foreign company with a place of business at 689 Parramatta Road Leichhardt, NSW, Australia 2040. Wright has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Wright Photo 2.1.

222. Plaintiffs allege on information and belief that Xaos Tools ("Xaos") is a California corporation with a place of business at 582 San Luis Road, Berkeley, California 94707. Xaos has offered to sell, offers to sell, has sold and sells infringing color image editing software in the United States and in this judicial district, including but not limited to Flashbox.

223. Plaintiffs allege on information and belief that Zones, Inc. ("Zones") is a Washington corporation with a place of business at 707 South Grady Way, Renton, Washington 98055-3233. Zones has offered to sell, offers to sell, has sold and sells infringing software, computers, scanners and cameras bundled with infringing color image editing software in the United States and in this judicial district, including but not limited to Sony RX640 Vaio computers, each bundled with ArcSoft PhotoPrinter 2000 Pro; Visioneer PhotoPort 7700 USB Flatbed Scanners, each bundled with MGI PhotoSuite III SE; Sony DSC P5 cameras, each bundled with MGI PhotoSuite; and MGI PhotoSuite software.

CLAIM FOR RELIEF: PATENT INFRINGEMENT

224. Plaintiffs reallege and incorporate by reference the allegations of paragraphs 1-223.

225. On information and belief, during the term of the `919 Patent and without authority from EFI, each of the Defendants has made, used, offered to sell and/or sold within the United States or has imported into the United States certain products especially designed for and intended to be used in infringing color reproduction systems. Some of these products that alone or in combination infringe one or more claims of the `919 Patent are identified in the foregoing paragraphs, and include scanners,

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digital cameras, computer systems, and/or photo-editing software. Defendants' acts therefore constitute direct infringement of the `919 Patent.

226. On information and belief, during the term of the `919 Patent and without authority from EFI, each of the Defendants actively has induced others to directly infringe one or more claims of the `919 Patent. Specifically, Defendants actively have encouraged others to combine accused products with each and every element of the color reproduction system claimed in the `919 Patent. Defendants intentionally have done so with knowledge of the `919 Patent, and therefore knew, or should have known, that they actively had induced and induce others to commit acts that constitute direct infringement of the `919 Patent.

227. On information and belief, during the term of the `919 Patent and without authority from EFI, each of the Defendants contributorily has infringed one or more claims of the `919 Patent by offering to sell or selling within the United States or importing into the United Sates certain products, including mini-labs, scanners, digital cameras, computer systems, photo-editing software and/or related accessories. Such products, which alone or in combination comprise a component of a patented system covered by one or more claims of the `919 Patent, are known by Defendants to be especially made or especially adapted for use in an infringement of the `919 Patent, and not staple articles or commodities of commerce suitable for substantial non-infringing uses.

228. Plaintiffs have been damaged by Defendants' infringement in an amount to be determined at trial. Because of Defendants' infringement, Plaintiffs have been irreparably harmed and have suffered impairment of the value of their patent rights. Moreover, Plaintiffs will continue to suffer irreparable harm unless Defendants are restrained from infringing the claims of the `919 Patent.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that the Court enter judgment, as follows:

A. That each Defendant and all of their officers, agents, affiliates, servants, employees, and attorneys, and all other persons in active concert or participation with them, be temporarily, preliminarily, and permanently enjoined from infringing, inducing infringement, and/or contributing

to infringement of the `919 Patent by importing, making, using, offering to sell, or selling products which embody the inventions claimed in said patent, or colorable imitations thereof;

B.   That Plaintiffs be awarded under 35 U.S.C. Section 284, in an amount to be proven at trial, damages adequate to compensate them for Defendants' infringement of the `919 Patent;

C.   That Plaintiffs be awarded their costs and prejudgment interest on their damages, as provided for by 35 U.S.C. Section 284;

D.   That the court determine this to be an exceptional case and award Plaintiffs their reasonable attorney fees, as provided for by 35 U.S.C. Section 285;

E.   That each and every Defendant be ordered to make a written report within a reasonable period, to be filed with the Court, detailing the manner of their compliance with the requested injunction; and

F.   That Plaintiffs be granted such other and further relief as the Court determines is just and proper.

DATED: April 25, 2002.

Respectfully,

By: _____
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[54] COLOR REPRODUCTION SYSTEM

[75] Inventor: William F. Schreiber, Cambridge, Mass.

[73] Assignee: Massachusetts Institute of Technology, Cambridge, Mass.

[21] Appl. No.: 374,804

[22] Filed: May 4, 1982

[51] Int. Cl.³ H04N 1/46
[52] U.S. Cl. 358/78; 358/80
[58] Field of Search 358/75–80

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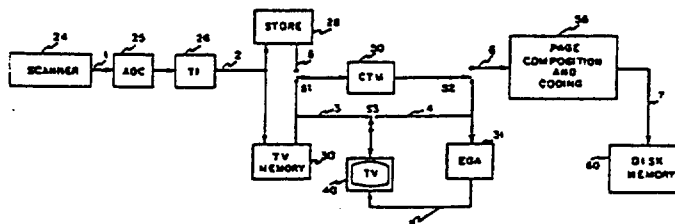
Primary Examiner—Michael A. Masinick
Attorney, Agent, or Firm—Arthur A. Smith, Jr.; Thomas J. Engellenner

[57] ABSTRACT

A system for reproducing a color original in a medium using a selected multiplicity of reproduction colorants, comprising: a scanner for producing from said color original a train of appearance signals dependent on at least three color values of said original; aesthetic correction circuitry for introducing aesthetically desired alteration into said appearance signals to produce modified appearance signals; and colorant selection mechanism for receiving said modified appearance signals and for selecting corresponding reproduction signals representing values of said reproduction colorants to produce in said medium a color match of said modified appearance signals.
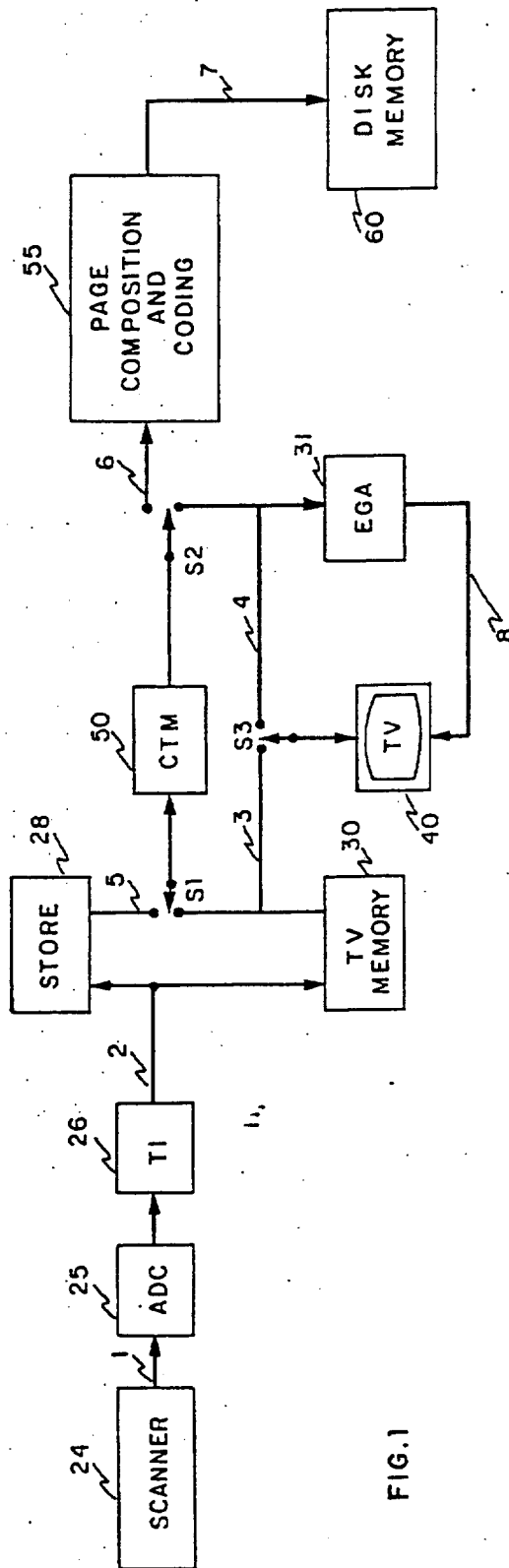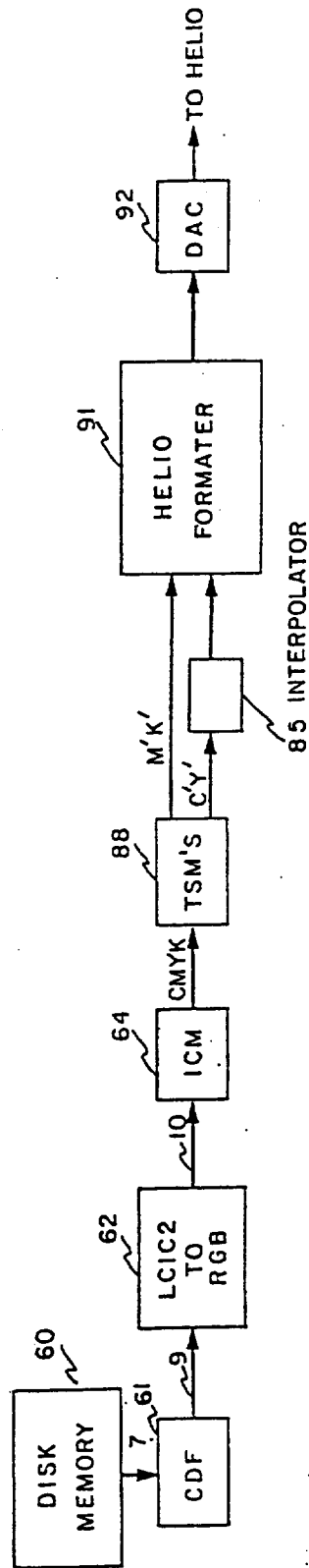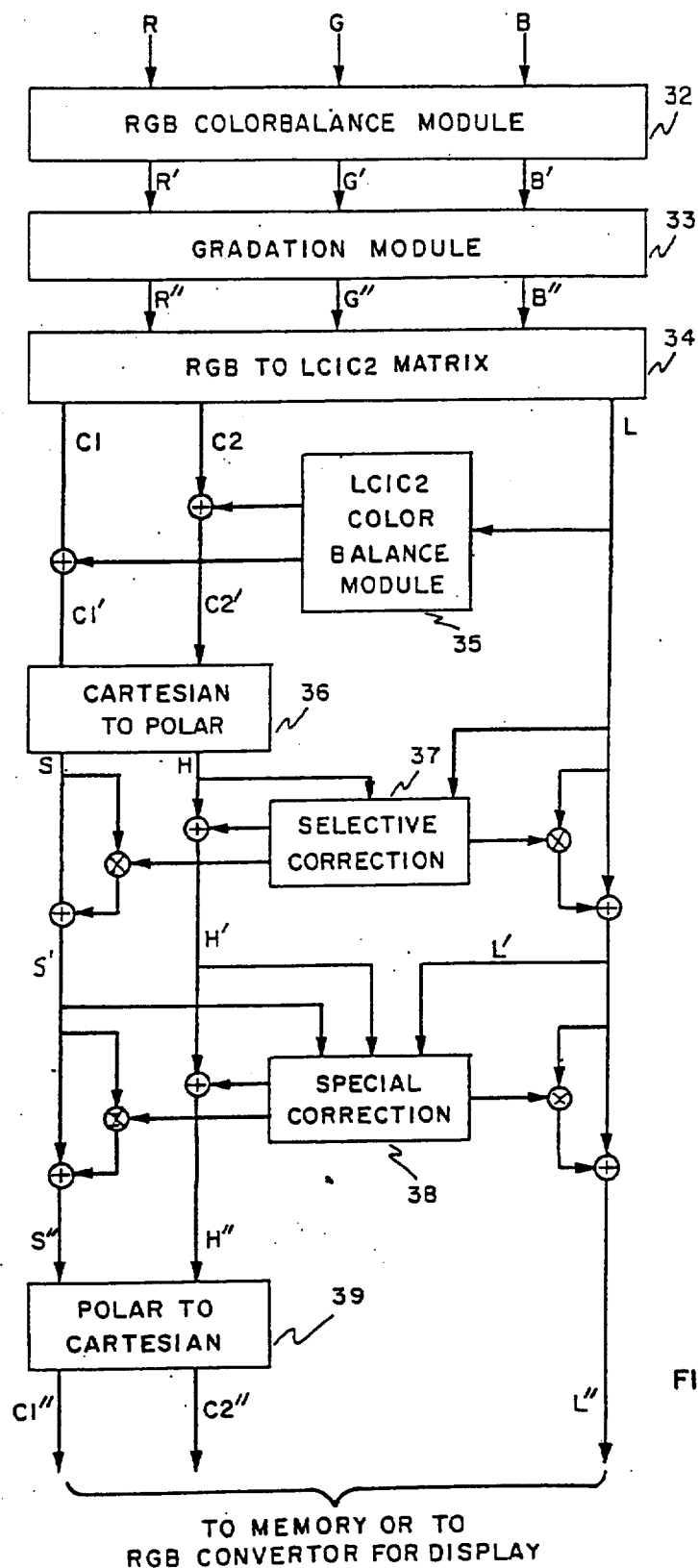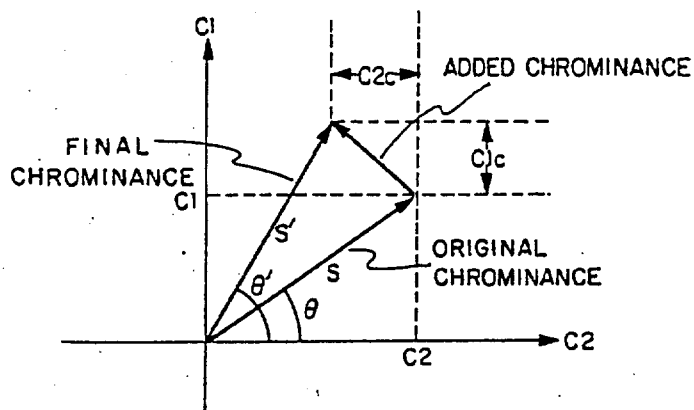
21 Claims, 9 Drawing Figures

FIG. 1

FIG. 2

FIG. 3

FIG. 3a

FINAL CHROMINANCE

ADDED CHROMINANCE

C2c

C)c

ORIGINAL CHROMINANCE

Cl

C1

S'

S

θ'

θ

C2

C2

FIG. 3b

CP

CP

72

HYBRID ANALOG-DIGITAL "KNOB COMPUTER".

4 AMPLITUDE CONTROLS

4 ANGLE CONTROLS

SYNCH

COUNTER

L_K

SEQUENCING

R/W K/V C/P

RAM A

R/W

K/V

MUX

ADDRESS LINE

RAM B

R/W

C1c

C2c

C1

C1'
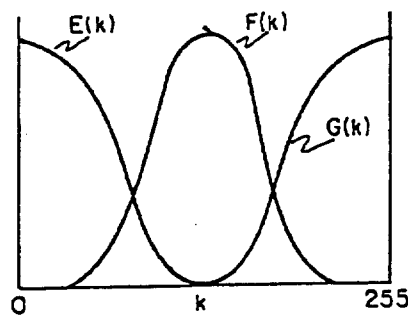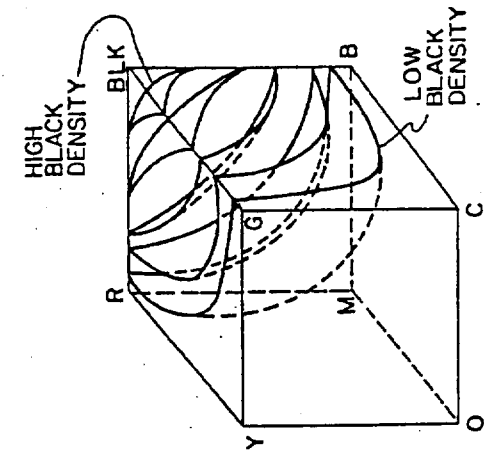
C2

C2'

L

FIG. 3c

E(k)

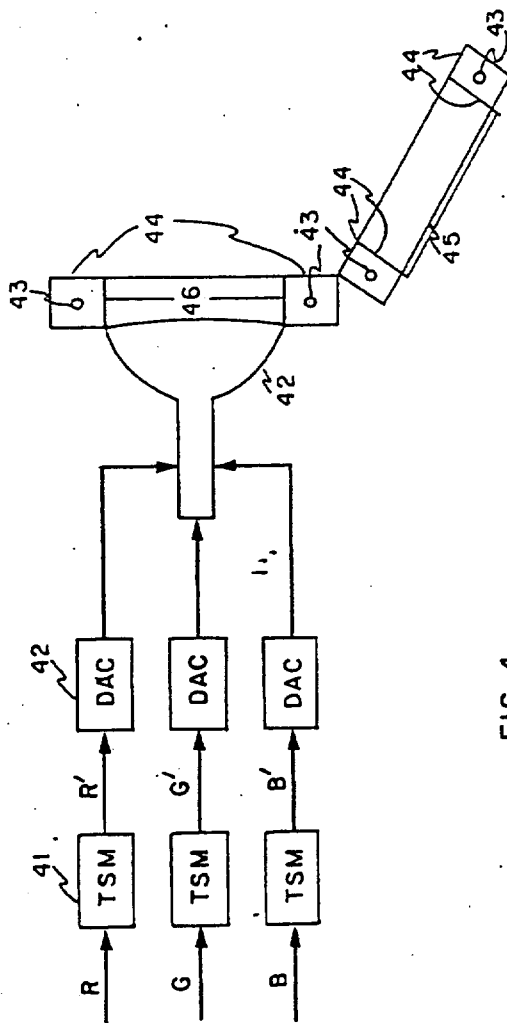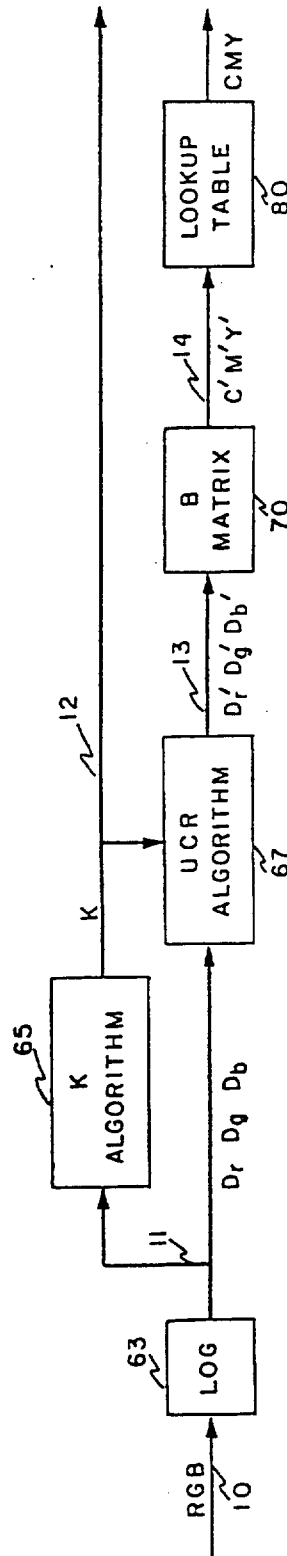F(k)

G(k)

O

k

255
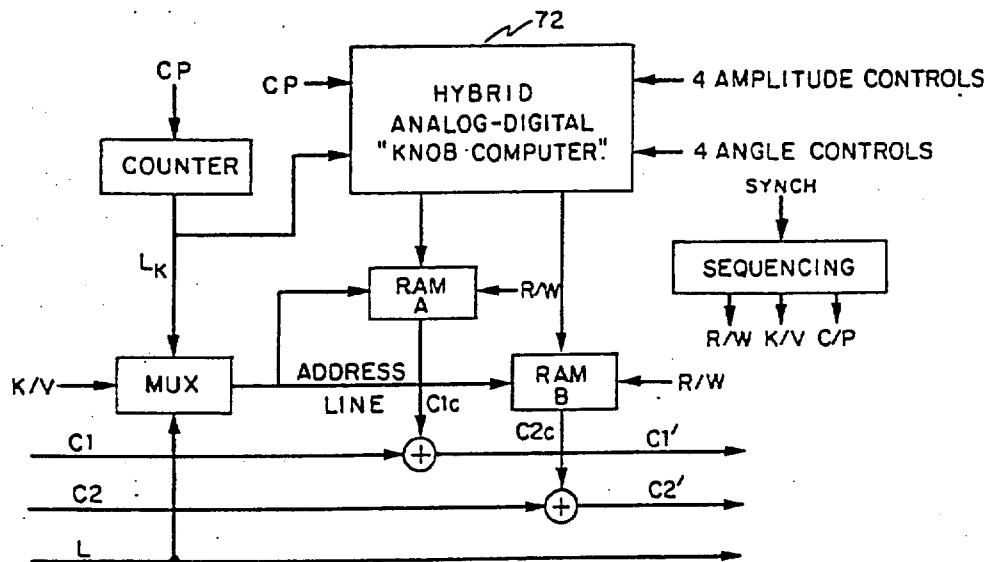
FIG. 6

FIG. 4

FIG. 5 INK CORRECTION MODULE

1

COLOR REPRODUCTION SYSTEM

BACKGROUND OF THE INVENTION

Attention is directed to a masters thesis by S. N. Mishra entitled "Real Time Ink Correction Module" (MIT, May, 1981) and a masters thesis by E. A. Lee entitled "Digital Color Translation" (MIT, May, 1981) both prepared under my supervision and hereby incorporated by reference. Attention is also directed to article written by myself and others, D. E. Troxel et al. entitled "Automated Engraving of Gravure Cylinders" *IEEE Transactions on Systems, Man and Cybernetics,* Vol. SMC-11, No. 9, pp 585-596 (September 1981) also incorporated herein by reference.

This invention relates to color processing and, in particular, to computer-assisted color editing systems. Its primary use is in color printing by the three most common processes—offset lithography, letterpress, and gravure. It is also applicable to plateless printing such as Xerography, to photography, and to any other color reproduction process which uses a small number of colorants, usually three or four, in various mixtures, more or less to match the colors of the original. In all these processes, it is usual to form three separate images by photographing or scanning the original through three different color filters, normally red, green, and blue. These three color separations are combined in various ways to produce printing plates or the equivalent thereof, which in turn control the amount of each colorant deposited at each point of the reproduction. A problem common to these processes is that the exact combination of colorants required for the match is not related, in any simple way, to measurements which can be made on the original. Achieving high quality reproduction is therefore difficult, costly, time-consuming, and requires great skill and experience on the part of the operator.

Another problem in these systems is that in almost all cases, exact matching of the original is neither possible nor desirable. Originals may not be perfect and, of at least equal importance, the gamut achievable with a particular set of inks and paper is often less than that of the original. Therefore deliberate distortion must be introduced. While this is possible, it is quite difficult to predict the precise effect of such distortion, so that in many cases trial plates must be made and proofs printed, thus adding to the cost.

In order better to describe my invention and its relation to the prior art, the following terms are defined at the outset:

Tristimulus Values—The amounts of three primary colored lights, which, when added, produce a visual, or "colorimetric" match with an original color. Such a set of primaries consists of the red, green, and blue phosphor colors of a TV tube, in which case the tristimulus values are called R, G, and B.

Appearance Signals—Values produced by any reversible transformation of RGB. Luminance/chrominance (LC1C2) and luminance, hue, and saturation (LHS) are two common sets.

Color—The specification of a colored stimulus requiring at least three component values.

Luminance—That aspect of a colored stimulus relating to its intensity.

Hue—That aspect of a colored stimulus relating to its color name.

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Saturation—That aspect of a colored stimulus relating to its purity, or absence of contamination with white.

Chrominance—That aspect of a colored stimulus relating to its hue and saturation. The saturation is aproximately the ratio of chrominance amplitude to luminance.

Color Space—A three-dimensional space in which each point corresponds to a color, including both luminance and chrominance aspects. RGB form such a space. LHS form a set of cylindrical coordinates in color space. The L-axis is the diagonal of RGB space, so that L=0 where R=G=B=0, and L=max where R,G, and B are max. The C1C2 plane is perpendicular to the L-axis in LC1C2 space. The hue (angle) and chrominance (amplitude) are polar coordinates in the C1-C2 plane.

Lightness—A non-linear transformation of luminance in which equal increments are equally perceptible.

Density—The negative logarithm, to the base ten, of the reflectance or transmittance of a point in an image. In the case of colored inks or dyes, the density is measured through an appropriate color filter. The density is approximately proportional to the quantity of ink laid down. CMYK refer to the densities of cyan, magenta, yellow, and black ink normally used in printing.

Gamut—The range of colors producible with a set of inks, lights, or other colorants. The gamut can conveniently be described in terms of a particular region of a color space.

Transparent—That property of an optical medium such as a dye or an ink in which each ray of incident light is transmitted without change of direction, but attenuated (multiplied) by a factor which is always unity or less.

Standard Translation—When the reproduction gamut is smaller than the gamut of the original, the usual case, the dynamic range (contrast range) of the original must be compressed and in most cases, some highly saturated colors must be desaturated. Some special colors, such as skin tones, if they cannot be accurately reproduced, are preferably distorted in certain ways. All these changes, taken together, constitute the standard translation.

Color Mixture Curves (CMC's)—The spectral transmission curves for a set of color separation filters which produce signals which are tristimulus values with respect to a certain set of primaries.

Additive Mixture—The type of color mixture in which the light of each component is summed. A color TV tube has this type of mixture, which obeys particularly simple mixture rules.

Subtractive Mixture—The type of color mixture in which the spectral transmittance curves of the components multiply. Color films behave this way, approximately. The mixture rules are more complicated, but the resultant color can be accurately predicted. Ink mixtures as encountered in typical printing processes are more nearly subtractive than additive, but are extremely difficult to predict accurately because of non-ideal behavior of the inks.

Tone Scale Memory—A table implemented in digital hardware or in software which serves the purpose of a non-linear transformation. The addresses, typically 256, are the various levels of the input signal, while the contents, typically 8 bits at each location, are the corresponding levels of the output signal.

3

Colorimeter—An instrument or method for measuring the tristimulus values of arbitrary color samples.

Various patents and publications have disclosed computer-assisted color processing systems. An article by W. L. Rhodes entitled "Proposal for an Empirical Approach to Color Reproduction" in *Color Research and Application* Vol. 3, No. 4, pp 197–201 (winter 1978) summaries the history of color correction systems. An article by P. Pugsley entitled "Pre-Press Picture Processing in the Graphic Arts Industry" in *IEEE Transactions on Communications*, Vol. COM-29, No. 12, pp 1891–1897 (December 1981) described the equipment and techniques used in preparing pages containing color images for printing including the use of a look-up table technique for determining required ink densities. This look-up table system is also described in U.S. Pat. No. 3,893,166 issued to Pugsley on July 1, 1975.

A number of other patents also describe look-up table systems including U.S. Pat. No. 3,612,753 issued to Korman on Oct. 12, 1971; U.S. Pat. No. 4,058,828 issued to Ladd on Nov. 15, 1977; U.S. Pat. No. 4,060,829 issued to Sakamoto on Nov. 29, 1977; and U.S. Pat. No. 4,127,871 issued to Sakamoto on Nov. 28, 1978.

Color editing systems for printing are suggested but not fully described in U.S. Pat. No. 4,037,249 issued to Pugsley on July 19, 1977 and in Japanese Specification No. 55-115043 by Ahei and Tamada published Sept. 4, 1980. There exists a need for a generally all-encompassing, color reproduction system, particularly for rotogravure processes and the like. The system should be capable of producing color images employing the entire gamut of colors physically achievable with all possible combinations of the colorants. Moreover, the system should provide precise compensation for the effects of ink and paper which are made automatically without depending on operator skill while maintaining the capability for operator-initiated aesthetic alterations.

BRIEF SUMMARY OF THE INVENTION

I have developed a new system for making color reproductions of images. In one aspect of my invention the image is scanned in, preferably using CMC separation filters, or approximations thereto, and stored in terms of appearance values, for example RGB. The image is displayed on a TV employing three tone scale memories (TSM's), by means of which the red, green, and blue phosphor intensities are made directly proportional to the RGB signals. Thus RGB are tristimulus values with respect to the TV phosphor primary colors. Since further processing will cause the ink image, corresponding to the RGB signals, to have the same tristimulus values as the TV, the TV is a colorimetric match for the final reproduction, and can be used to judge its appearance. If the original image has a greater resolution than the TV can accomodate, an image of TV resolution, typically 512 lines with 512 samples per line, is derived from the higher resolution original by means well known in the art.

In another aspect of my invention the operator manipulates the TV image interactively in terms of appearance values, introducing aesthetic corrections and such other changes as desired. He need have no knowledge of the ink and paper characteristics in this operation. If he inadvertently calls for a color which is non-reproducible, the display will inform him so that he can make a suitable readjustment. In the case of good quality originals having no special characteristics which would call for unusual reproduction, the standard translation can

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be applied atutomatically, and the operator can then make any additional changes, if deemed necessary.

The original high resolution image may be processed using the same settings chosen by the operator interactively. The corrected image is returned to storage, still in terms of appearance values. [The various corrected images plus other material to be printed would normally be combined, at this stage, by some page composition process, to produce full pages in memory, but such a process is not part of the present invention.] The corrected image of stage 3 may be retrieved from storage. Ink density images, as required for a colorimetric match with the corrected images, are calculated by means including a lookup table (LUT).

In a further aspect of my invention the computed ink density images are used to produce printing plates or surfaces directly, to make intermediate images from which plates may then be made, to control a plateless printing process such as Xerography, or used in any other way to control the amount of colorant delivered to the final page at each point. Steps 4 and 5 may be combined and, if sufficient computation power is provided, page composition may also be carried out at the same time. It is obviously advantageous, once the operator has finished with all the images to be printed, to combine as many operations as possible so as to reduce the throughput time.

BRIEF DESCRIPTION OF THE DRAWINGS

FIG. 1 shows the operation of the system from the input scanner to the point when the aesthetically corrected images are stored on disk, as appearance values, in coded form.

FIG. 2 shows the processes whereby the corrected appearance value images are retrieved from disk, decoded, changed into ink density images and further processed as required by the output device.

FIG. 3 shows the operation of a Color Translation Module (CTM). FIGS. 3a, b, and c show further details of one of the component modules of the CTM, the LC1C2 color balance module.

FIG. 4 shows details of a comparison display which can be used by the operator to judge the prospective appearance of the final ink image.

FIG. 5 shows the operation of an Ink Correction Module (ICM).

FIG. 6 shows contours of constant black in ink density space.

DETAILED DESCRIPTION OF A PREFERRED EMBODIMENT

The invention will be described in connection with gravure printing using cylinders engraved by the Helio-Klischograph, manufactured by Rudolph Hell Gmbh. of Keil, Germany.

Gravure printing typically is carried out on web-fed rotary presses. The printing surface is in the form of a cylinder, having an array of small etched or engraved cells, typically 150 to 200 per inch. The cylinder is rotated in a bath of ink and the surface wiped clean by a "doctor blade" as the surface emerges. Paper is then fed against the cylindrical surface, picking up the ink from the cells. The ink density of every cell on paper depends upon the quantity of ink transferred from the corresponding cell on the gravure cylinder and thus depends upon the cell geometry. By modulating the cell size on the cylinder surface, it is possible to modulate the ink density of the corresponding dot on paper, thus

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forming a variable tone image. Ink transfer is virtually independent of speed, making this process very suitable for color printing.

The color pages are printed by overlaying multiple images, one in each primary color ink, so that the combination achieves the desired result. The primary color inks used in the printing industry are yellow, cyan (also called process blue) and magenta (also called process red). Although, in principle, it should be possible to generate any arbitrary color within the limitations of the gamut of the inks, by combining only these three primary colors, in practice, a black printer (also called the "key") is often included.

The Helio Klischograph engraves the cells in gravure cylinders by means of a battery of diamond styli which operate at 3600 to 4000 cells per second. For a typical cylinder eight feet long and forty-three inches in circumference and capable of printing thirty two magazine pages, eight styli are spaced along the cylinder. Each moves in and out, cutting four pages as the cylinder rotates, engraving the entire cylinder in about an hour. Specially prepared images called "Cronapaques" are mounted on a scanning drum which rotates in synchronism with the cylinder to be engraved. Optical sensors mounted on the scanning drum provided the video information to the diamond stylus engraving heads. Like many facsimile systems, the Helio, once started, must be supplied with a real-time data stream. The engraving takes approximately one hour with a data rate of 86.4 kilobytes/second. This imposes an upper bound of 11.5 microseconds on the processing time for the computation of ink densities from every RGB sample corresponding to a "pel" (picture element).

It will be evident to those skilled in the art what modifications would be required to operate the invention in connection with other forms of printing.

1. Scanning and Aesthetic Correction

As shown in FIG. 1, original copy, either transparencies or prints, are scanned on a three-color scanner, 24, such as a Hell Model 299, producing three analog color head signals, 1. Note that the color computer of said scanner is not utilized. If the scanner is equipped with an unsharp masking (USM) feature, such auxiliary USM signal may be combined with the RGB signals in the usual way. The signals taken into the system are preferably proportional to lightness values rather than intensity values, so that a larger dynamic range can more readily be handled after digitization. In the aforementioned Hell 299 scanner, the "quasi-log" signals are suitable for this purpose. The signals are digitized by analog-to-digital converter, 25, and converted to tristimulus values, 2, by converter, 26. If the scanner is equipped with true CMC separation filters, this operation is not needed. If the deviation from the correct filter shapes is small, then the conversion can be done adequately by means of a 3×3 linear matrix. If the deviation is very large, it may be necessary to use a lookup table for accurate conversion. [However, in all cases, even if the conversion is not made, the pictures which will be viewed on the TV display (see below) will still accurately represent the final image. The CTM can then be used to correct the input errors.] The converted signals, 2, are temporarily stored in memory 28. A lower resolution version, suitable for TV display, is stored in TV memory 30. The TV memory has the property that it can be read fast enough to generate

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digital video of high enough data rate to give a standard thirty frame/sec display.

Switches S1 and S2 are both put in the down position so that the TV RGB signal, 3, passes through the CTM, 50. The TV display, 40, can be connected either to the input or output of the CTM by means of switch S3, although normally it is connected to the output. The operator now makes adjustments, interactively, while observing the TV display, until he is satisfied with the image. The Excess Gamut Alarm (EGA), 31, which is a lookup table, causes a tell-tale flicker of the viewed image at any point where non-reproducible colors are called for. To do this, it must make a real-time computation of the ink densities to see whether they are larger or smaller than physically realizable. It is an abbreviated version of the ICM, to be described below.

When the operator is satisfied with the image quality, he throws S1 and S2 up, passing the high resolution RGB data, 5, from the store, 28, through the CTM, generating corrected high resolution signals 6. These data are now finally stored on disk, 60, ready to be retrieved for engraving. We have found that these data can be compressed substantially if they are converted from RGB to LC1C2 form using the following relations, and the two chrominance components are then reduced in spatial resolution by a factor of two in both horizontal and vertical directions.

$$L = 0.299 \ R + 0.621 \ G + 0.080 \ B$$
$$C1 = 0.498 \ R - 0.442 \ G - 0.056 \ B$$
$$C2 = -0.162 \ R - 0.336 \ G + 0.498 \ B$$

These relationships are scaled for $0 = < RGB - < 255$ and $-128 = < C1, C2 = < 127$. The resolution reduction of C1 and C2, which does not materially affect the image quality, results in an overall 2:1 compression for the three signal components. The compression is carried out in coder, 55, which also has the page composition function, which, as mentioned above, is not a part of this invention.

In this embodiment of the invention, cylinders are engraved simultaneously with retrieving the corrected coded images from the disk. This requires that the conversion from appearance signals to signals representative of ink density must be carried out in "real" time during the engraving process. This high speed operation is required in order to take advantage of the possibility of reducing the storage requirement by storing the data in compressed appearance form.

2. Conversion to Ink Density Values and Engraving the Cylinders

As shown in FIG. 2, the compressed images, 7, are retrieved from the disk and interpolated out to full resolution by the Color Data Formatter (CDF), 61, producing signals, 9, which are much like the signals, 6, of FIG. 1. These are now reconverted to RGB form by a transformation inverse to that shown above:

$$R = L + 1.407 \ C1$$
$$G = L - 0.677 \ C1 - 0.236 \ C2$$
$$B = L + 1.848 \ C2$$

Conversion from RGB to ink density form is the function of the Ink Correction Module (ICM), 64. This function can be implemented in many different ways, all of which require a lookup table. For example, since R, G, and B are 8-bit numbers, there are about 16.8 million input combinations, each of which is a numerically but not necessarily perceptibly distinct color. For each of the combinations within the gamut of printing inks, there is at least one set of CMYK values which produce

a visual match. C, M, Y, and K are also 8-bit numbers. Hence a memory of 16.8 million, 32-bit words would suffice. At the present cost of memory, this might not be economic. Smaller tables plus interpolation can be used instead. Hereinafter wherever the expression "lookup table" is used, it is understood to comprise both the memory which holds a certain number of output values (the "contents" or "entries") corresponding to a certain number of input values (the "addresses"), together with interpolation means to calculate output values when input values are intermediate between those for which output values are stored in the memory. What will be described below is a scheme using a rather small amount of memory and which clearly shows the physical relationships among the variables.

The Helio Klischograph engraves cells in the cylinder producing densities on the output copy which are not exactly in proportion to the analog input signal. In order to achieve ink densities in the reproduction which are exactly proportional to the output signals of the ICM, the Helio transfer characteristic is carefully measured and a compensating distortion used in the Tone Scale Memories, 88. The predistorted signals C'M'Y', and K' are then sent to the Helio Formatter, 91. This unit has the function of synchronizing the entire color engraving system to the rotational speed of the Helio. In this system only one cylinder is engraved at a time, so that the one output is converted to analog form by the digital-to-analog converter, 92, and then sent to the Helio. In the particular case of the Helio, the black and magenta cylinders use one raster ("elongated") while the yellow and cyan use another ("compressed"). Data is stored on the disk only in elongated form. For the yellow and cyan cylinders, the image data is converted to compressed raster using a hardware interpolator, 85. Either one or two data samples per cell can be used, depending on the type of copy.

For using the system with letterpress or offset printing, halftone images can be used. These can be produced by various electronic screening methods well known in the art. Alternatively, continuous tone ink density images could be produced in the form of film negatives, from which the printing plates could be made by the usual methods. In both cases, however, the resolution required in the digitally processed images is of the order of 600 samples per inch, which is much greater than in the case of the Helio, where only one or two samples per cell suffice. The principle of operation remains the same, but the Helio has a distinct advantage over the other plate or cylinder preparation methods when computer-based pre-press systems are considered.

3. The Color Translation Module (CTM)

The CTM is shown in FIG. 3. It receives RGB digital TV signals at a 10 Mhz data rate from the TV memory. These signals pass through a succession of modules, eventually emerging in LC1C2 form. For display in the TV, these signals are converted to RGB form using the above mentioned transformation, implemented in high speed digital hardware. When the CTM is used to process the high resolution original image, the LC1C2 output is returned directly to memory without conversion to RGB form.

The first module in the CTM is the RGB Color Balance Module (CBM), 32. Its function is to produce, from the original copy, the same signals that would have been produced had the illumination been different when the original was first exposed. In this way, small

errors in color balance or exposure can be corrected rather accurately. The RGB CBM operates by passing the RGB signals through TSM's which incorporate the film transfer characteristic so that the output is proportional to the logarithm of the exposure of each layer in the film emulsion. These values can be increased or decreased by adjustable increments, independently for each layer, to simulate more or less exposure in each color band. The corrected exposures are passed through a second set of TSM's, again incorporating the film transfer characteristic, to give the adjusted signals, R'G'B'.

The next unit is the gradation module, 33, which adjusts the contrast and brightness of the image. The operator has six knobs available, the settings of which determine the contents of three identical TSM's through which the R'G'B' signals are passed. These are quite similar to those found on color scanners. The "white" and "black" controls select the end points of the scale, thus selecting a suitable range of input levels to be mapped into the output range 0 to 255. The rest of the controls have no effect on the end points. The "brightness" control gives a concave up or down shape to the transfer curve; the contrast control makes it "s" shaped in either direction; the highlight and shadow contrast controls affect those regions of the curve more than the balance. Note that the computation of the TSM contents in response to knob motion need only be done rather slowly, so that it is complete in one or two frame times. The TSMs are loaded during the TV retrace time so as not to interfere with the display. The following modules in the CTM use a similar technique, i.e., a logically simple but high speed video data path in combination with a more complicated but low speed knob computer.

The next step is conversion to LC1C2 form by a hardware implementation of the given transformation, followed by the LC1C2 Color Balance Module, 35. Its function is to make somewhat different color balance adjustments, including separate adjustments in highlights, midtones, and shadows. It can correct for blue shadows, for example, which sometimes occur in outdoor scenes in clear weather when the shadows are illuminated primarily by blue skylight. It operates by adding to the chrominance vector, another vector which is adjustable in amplitude and direction, independently in highlights, midtones, shadows, and overall.

The next two modules operate on chrominance in polar coordinates, so that the C1C2 signals must be converted in a hardware Cartesian to Polar Coordinate Converter, 36. Selective Correction, 37, divides the hue circle into seven smoothly overlapping regions, red, orange, yellow, green, cyan, blue, and magenta. Signals within each region can be independently adjusted in hue, saturation, and luminance. With these controls, the operator can achieve nearly any desired overall color change in an image. For example, the reds can be made darker, less saturated, and less orange, while the blue-greens can be made lighter, more saturated, and greener, and so one. As mentioned above, this module is divided into a video path and a knob computer. The latter computes the contents of three memories which are then addressed by hue, the contents being added to L, H, and S.

The final module, called Special Correction, 38, operates in much the same way as Selective Correction, 37, to change the luminance, hue, and saturation, but only within a "chromatic neighborhood" of adjustable width

and location in both hue and saturation. In this way, it is often possible to pick out one object in the image and change it without affecting the balance of the image. In the absence of such a capability, it is necessar to draw very precise outlines around objects in order to achieve local color correction.

After Special Correction, hue and saturation are converted back to C1C2 form by a hardware Polar to Cartesian Coordinate Converter, 39, for passage to storage or the display.

It will be noted that hue is a "circular" variable corresponding to angle in polar coordinates. Thus any and all values of the angle represent real hues. To change hue, a correction can be added of any amount without regard for the possibility of producing a non-realizable value. Saturation (or chrominance) and luminance, however, are non-negative variables with maximum values. Hence when it is desired to change them, care must be taken not to go off scale. For this reason, the values of the selective or special corrections computed by the knob computers do not only depend on the knob settings, but are zero for original values of S or L which are either zero or maximum, smoothly varying to a maximum value for intermediate values of S and L. In addition, changes in these variables are more or less perceptible according to the proportion the change bears to the original value. Therefore the correction is multiplied by the original value and added to it to secure the appropriate proportionality.

In order to make the operation of the CTM understandable to those skilled in the art, a more detailed explanation of one of the modules, the LC1C2 Color Balance Module, 32, is given. As noted above, this module enables the addition, to the chrominance of each image sample, of a chrominance vector which is adjustable in both amplitude and angle, as shown in FIG. 3a. Said additional vector can be separately adjusted in the highlights, midtones, and shadows of the signal, and combined with a vector which is independent of luminance. Thus there are eight controls used by the operator to adjust the angle and amplitude of the four components of the added chrominance.

FIG. 3b shows the manner in which the added components are calculated and added to the input chrominance. For purposes of explanation assume that the luminance is represented by an 8-bit digital number and thus has 256 possible values ranging from 0 to 255. The chrominance components also use 8-bit representations and thus range from -128 to $+127$ in value. Two random-access memories (RAMs) of 256 8-bit numbers each are used to store the components of the added chrominance vector. These components have the values:

$$C1c(k) = No \cos To + Ns\ E(k) \cos Ts + Nm\ F(k) \cos Tm + Nh\ G(k) \cos Th$$

$$C2c(k) = No \sin To + Ns\ E(k) \sin Ts + Nm\ F(k) \sin Tm + Nh\ G(k) \sin Th$$

where k is the luminance value, No, Ns, Nm, and Nh are the amplitudes and To, Ts, Tm, and Th are the angles (hues) of the four added components. The subscripts o,s,m, and h mean overall, shadows, midtones, and highlights, respectively. E(k), F(k), and G(k) are weighting functions which serve to confine the effect of each set of controls of the appropriate portion of the tone scale, as shown in FIG. 3c. Many different shapes of weighting functions can be used.

A sequencer unit receives TV synchronizing signals of conventional type, which are also used to synchronize the TV display used for observation. During the active portion of each scan line, the K/V signal switches the multiplexer (MUX) to the V (video) position, and the R/W signal switches the RAMs to the R (read) position. Thus the input luminance signal, L, addresses the RAMs, retrieves C1c and C2c, and results in the RAM contents being added to the input chrominance components to produce the outputs C1' and C2'.

The sequencing circuit also produces a clock pulse (CP) which increments a counter which produces a synthetic luminance signal, Lk. The knob computer, 72, continuously calculates C1c and C2c as given by the above expressions. Each pair of values must be written into the RAMs after calculation. In order not to disturb the viewed image, this can conveniently be done during the TV retrace interval between scan lines. During this interval, the MUX is switched to K (knob) position and the RAMs to W (write), and the CP input to the knob computer enables the output of the previous computed values to be stored. Since 512 values must be computed in response to each set of knob positions, and since there are 525 lines per TV frame, an entire computation can be done in one frame time, with one datum being transferred to RAM in each retrace interval. It has proven convenient to use a hybird analog-digital computer to perform the said computation, but any known form of computation can be used in the invention.

4. The Comparison Display

A very important element in the system is the Comparison Display, shown in FIG. 4, on which the operator relies to judge the prospective output image. For colorimetric accuracy, the separate phosphor intensities must be exactly proportional to the tristimulus values of the displayed image with respect to the TV phosphor primaries. [If the RGB values were with respect to some other set of primaries, they could easily be converted with 3×3 matrix transformation.] The desired proportionality can be achieved by measuring the phosphor intensities, one by one, as a function of the analog input voltage, and inserting a compensating pre-distortion in the TSM's shown in FIG. 4. After said predistortion, the signals are converted back into analog form by the digital-to-analog converters, 42, and applied to the TV monitor, 42. The monitor contains an analog video amplifier in each channel, so that peak phosphor intensity is attained with a digital input near 255 and zero intensity with digital input near 0, by adjustment of the amplifier gain and offset controls.

One more step is required to give an absolute calibration. As shown in FIG. 4, an illuminated image is placed next to the TV, and both are surrounded by an illuminated border. A sheet of white paper of the type to be printed is placed in the comparison position and its illumination adjusted so as to be equal to peak white of the TV. Of course, both peak white and the illumination must be of a suitable color temperature, for example 5000 degrees Kelvin. Finally, it is found useful to keep the surround near peak white as a means of reducing the influence of extraneous nearby visual stimuli. Care must be taken that no light falls on the TV tube. A method to accomplish this is to arrange fluorescent lamps, 43, in a square pattern a few inches in front of the tube 42, and the comparison image, 45. Diffusing material, 44, is placed in front of the lamps and next to the comparison image, while opaque material, 46, is placed so as to shield the tube from the light.

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As a test of the system, a test pattern of known tristimulus values is printed. The corresponding RGB signals are displayed on the TV. The two images should match. Occasional adjustment of the analog gain and offset controls in the TV video amplifiers is required to recalibrate the display. Only very rarely must the TSM's be recalibrated.

It is to be pointed out that the TV display has been described without regard to the printing inks. This is an important difference from prior art, in which an attempt was made to make the TV look like the printed page. In the current invention, the TV simply displays colors of correct tristimulus values, something it does very easily since it is an additive display. No change in the TV is required for use with different inks and paper, or even with a different printing process. Only the EGA contains any data relating to the specific inks being used.

5. The Ink Correction Module (ICM)

The ICM is shown in some detail in FIG. 5. As discussed above, it could be implemented in one huge lookup table, but this would be uneconomic and would also give no clue as to how to find the data to be stored in the LUT, short of an impossibly large printing test. For purposes of this explanation, let us assume that the LUT, 80, has 512 entries only. The RGB input signals, 10, are transformed by TSM's, 63, into the log domain. If RGB are linear, then the conversion is a true log transformation; if RGB are on the preferred lightness scale, then the transformation is more nearly linear. In any event, the signals Dr, Dg, and Db, 11, are a representation of the color in terms of three ideal dyes, each of which absorbs, more or less according to density, in only one band (i.e., in red, green, or blue) and is perfectly transparent in the other two bands. Since these are not real dyes, they can have any density, and in particular, the maximum density must be high enough to represent the darkest color encountered. A previously-determined amount of black, as explained below, is to be printed for each combination of densitities, and this value is calculatted in the K-algorithm module, 65, producing the black density signal, K, 12. The Under-Color Removal (UCR) module, 67, calculates the densities of the underlying inks which, in combination with the chosen amount of black, produce the same appearance. If the inks were transparent, each of the colored inks should be reduced in density by exactly the amount of black added. Since the inks are generally far from transparent, this simple relationship is quite inaccurate except for a very small amount of black. We have found that a fairly accurate result is achieved with the following relationship:

$$D'r = (Dr - K)/(1 - aK)$$
$$D'g = (Dg - K)/(1 - bK)$$
$$D'b = (Db - K)/(1 - cK)$$

The factors a,b, and c are properties of the black ink. They can be found by a regression analysis using a number of printed samples of ink combinations with and without black. It should be noted that the numerator of these equations gives the values which would result if the inks were transparent. The denominator is the correction due to the non-transparency of the black ink.

It is now required to find the densities of the actual inks to be used which, in combination with the chosen amount of black, will have the appearance specified by the tristimulus values, R, G, and B. This is the usual "ink correction" problem, which, in the prior art, is solved by forming an electronic model which is an approxi-

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mate analog of the ink mixing process. In the current invention, this is done in a two-stage process, a simple model followed by a small lookup table for final corrections. The model is implemented in the "B-matrix", 70, and can be of the following form:

$$C' = d\ Dr' + e\ Dg' + f\ Db' + m$$
$$M' = g\ Dr' + h\ Dg' + i\ Db' + n$$
$$Y' = j\ Dr' + k\ Dg' + l\ Db' + o$$

Such a model corrects primarily for the unwanted absorptions of the inks, i.e., the fact that the inks absorb in wavelength bands other than that desired. For example, the cyan ink should absorb more or less red light in proportion to its density, but be completely transparent to blue and green. In fact it also absorbs somewhat in blue and green. The coefficients d through o can be found by a regression analysis of a large number of printed samples.

After processing by B-matrix, 70, the densities C', M', and Y' will have some remaining error, which is removed by the LUT, 80, which operates in the following manner, which will be described using particular numerical values for the precision of the signals and the size of the table, although the invention is not limited to said values. If the input signals are eight bits each, representing 256 possible analog signal values, the three most significant bits of each input variable, 9 in all, are used as addresses to the table. At each address are stored the precise values of the ink densities, C, M, and Y which produce the correct appearance. [The manner of finding these values is discussed below.] The 5 least significant bits of each input signal, 15 in all, are used for three-dimensional linear interpolation, in a manner well known in the art, to give the final output values.

6. Finding the Values for the B-matrix

In order to explain how the LUT values and matrix coefficients are found, it is first necessary to discuss the operation in the case of three-color printing, without black. In that case, blocks 65 and 67 are absent from FIG. 5, and the signals 11 are the input to the B-matrix, 70. The fundamental problem, given the appearance values, RGB, of a particular colored visual stimulus, is how to find the exact combination of inks which form a visual match with said stimulus. For the sake of explanation, we must first assume that such a combination exists. This is done by means of the following steps: (a) Print a suitable number of combinations of inks, for example 9 evenly-spaced steps of density, ranging from zero to 256 in steps of 32, of each of the three inks, or 729 separate colors in all; (b) Measure the appearance values of each color patch, using a very accurate colorimeter, such as the Hunter Model D 25-9; and (c) Find the coefficients of the B-matrix by regression analysis, so as to minimize the mean square error between its outputs, C'M'Y', and the actual densities of the patches, CMY, for the 729 experimental cases.

7. Finding the Values for the Lookup Table

There are 512 specific entries in the LUT. The addresses of these entries are various combinations of C'M'Y', where the variables take on the values 0, 32, 64 . . . 224. Each of these combinations represents the appearance of a particular color in terms of idealized inks. The entries in the LUT are the values of ink density, CMY, which exactly match these colors. In general, the CMY values will be different from the corresponding C'M'Y' values. The experimental data, derived from the 729 patches. consists of the values of

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CMY equal to 0, 32, 64, . . . 256, together with the corresponding measured RGB values. These are then processed by TSM's, 63, and B-matrix, 70, to give C'M'Y' values which in general do not include the values 0, 32, 64, . . . 224. Thus the experimental values are not coincident with the desired LUT entries, but are interspaced between them in color space. The LUT entries must be found from the experimental data by a process of interpolation. Any known interpolation process is within the scope of the invention. For example, we have used a manual, graphical method where contours of constant C'M'Y' were drawn in between the experimental points located in CMY space.

It should be noted that a considerable amount of variability will be found in the colorimeter readings of the experimental ink patches. When finding the B-matrix coefficients by regression, this variability is automatically averaged out. However, when interpolating, some averaging of the data is an essential preparatory step. It is also advisable to adopt some method for detecting highly erroneous data due to some random defect in ink or paper, so that such data can be excluded from the process.

The LUT values can also be found by an iterative method which lends itself to rapid machine computation. The steps in this process are as follows (a) Begin with approximate values of the LUT entries, obtained by manual interpolation or by any other convenient method. Print these colors, measure the corresponding RGB values, and process the latter with modules 63 and 70, finding the corresponding C'M'Y' values; (b) Adjust the LUT entries according to the error in C'M'Y', so as to reduce said error on the next iteration of the procedure; and (c) Repeat the process until the error is reduced to an acceptably small value.

The repeated printing step, which is very time-consuming, can be avoided by interpolating within the experimental data. This amounts to using the experimental data in a LUT exactly like 80, except that when interpolating from CMY to RGB (or directly to C'M'Y'), the experimental patches are precisely the entries required for the table, since CMY have the values 0,32, 64, . . . 224.

8. The Four-color Case

For understanding the four-color case, we return to FIG. 5, including blocks 65 and 67. Recall that the sensation of color has only three degrees of freedom, i.e., three numbers serve to specify the appearance of any color. Obviously, therefore, we cannot independently specify all four ink densities and have the resultant ink mixture match a given color. In fact, any one of them can be specified independently and then only one unique combination of the remaining three can be found to make the match. A limitation on this process is found in the limited range of each ink. If the "match" calls for a negative density of any ink, or an amount in excess of the maximum printible density, then such a combination is physically unrealizable.

To elucidate the relationship of the black ink to the others, it is necessary to print all combinations of all four inks, for example nine different densities, ranging from zero to maximum, of each of the four inks, for a total of 6561 color patches, and then measure the resulting colors (i.e., RGB values) on a colorimeter. There will be a certain gamut obtainable with the three colored inks only, and a different gamut obtainable when at least some black is used. There will be an overlap of

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these two gamuts, and in this first range, for each color, there will be a certain range of black which is permissible. However, there also will be a second range of colors in which no black is permissible (generally these are colors using only one or two colored inks) and there will be a third range of colors which require the use of at least some black.

In the normal use of UCR, as indicated by the name of the process, black is used to replace some colored ink. This is possible only in the aforesaid first range. In the second range, no black can be used at all. The third range, representing many useful dark colors, cannot be attained by the normal operation of UCR. The present invention provides a method to obtain nearly the entire gamut of colors physically achieveable with the four printing inks.

If the inks were transparent, the density at any wavelength would be the sum of the densities of the separate inks at such wavelength. Prior art UCR uses this concept to add an amount of black at each point which is a given percentage, called the UCR percentage, of the lowest of the three ink densities. Each colored ink density is then reduced by the density of black chosen, theoretically resulting in unchanged values for the ink density as measured in the blue, green, and red parts of the spectrum, and therefore giving the same color. This procedure is defective for two reasons. One is that due to partial nontransparency of the inks, the total density is actually less than the sum of the component densities. Therefore colors with and without black will not match exactly. In addition, there is no way to reproduce colors in the aforesaid third range.

Aside from the fact that the prior art UCR method is inaccurate and that the complete gamut of colors cannot be produced, there is no good reason to use a constant percentage UCR, regardless of the overall density level. The reason for using any black at all in the prior art is primarily to reduce the amount of more expensive colored ink. Because of non-transparency, the amount of colored ink saved in light areas is substantially less than the amount of black added. Thus there is very little money to be saved by using black in light tones, since very little colored ink can be removed. Another reason for not using much black in light tones is that any error in the black calculation will produce an easily perceived reduction in image quality. In the dark areas, there is no reason for using only a little black. The colored ink reduction need not be calculated so accurately and, by using a large amount of black, a large amount of colored ink (and money) can be saved. Furthermore, in order to produce those colors in which one or two of the colored ink densities are zero, 100% UCR is required. For these reasons, the present invention provides for the use of a low percentage UCR in light tones, and a high percentage UCR in dark tones.

In FIG. 5, it is recognized that the quantities C'M'Y' are the densities of non-real inks, and thus can be made high enough to represent all the colors which are achievable with the four real inks. Thus the UCR concept can be applied to these non-real inks and still obtain the entire gamut. This is done by specifying the amount of black at each point in the LUT, ranging from none at all in the areas of one or two colored inks only (the second range) and in the very light tones of the first range, smoothly increasing in the darker tones of the first range, and then going up to a maximum of black in the colors in the aforesaid third range. FIG. 6 shows contours of constant black level as might be reasonable

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with typical inks. It will be recognized that the appropriate distribution of black depends on detailed measurements made on the particular set of inks to be used.

Once the amount of black is chosen at each point in the LUT, the method of finding the LUT values is exactly the same as in the three color case, except that in each printing test (or interpolation) in the iterative method, the chosen amount of black is printed as well. If the UCR algorithm of module 67 were perfect, the LUT entries of the three-color case would serve equally well in the four-color case, since the LUT is used to find the real ink densities, CMY, which exactly match the color underlying the black, which is represented by C'M'Y'. Since the UCR algorithm is good but not perfect, a few iterations, starting with the three-color values, will give the proper four-color values.

Referring again to FIG. 5, it is to be noted that, in the actual process, the signals 11, representing the appearance of colors in terms of ideal inks, serve as the input to the K algorithm module, 65, which calculates the black ink density. However, said density has been determined as a function of C'M'Y'. The B matrix, 70, and the UCR algorithm, 67, are simple and therefore invertible closed-form algebraic expressions. Therefore it is straightforward to redefine K in terms of Dr, Dg, Db. It is useful, in this process, to have defined K in closed algebraic form rather than as a table of 512 discrete values so that, in the conversion to Dr, Dg, Db dependency, no interpolation errors are introduced.

What I claim is:

1. A system for reproducing a color original in a medium using a selected multiplicity of reproduction colorants, the system comprising in serial order:
 a. a scanner for producing from said color original a set of three tristimulus appearance signals dependent on the colors in said original;
 b. display means connected to the scanner for receiving the appearance signals and aesthetic correction circuitry for interactively introducing aesthetically desired alterations into said appearance signals to produce modified appearance signals; and
 c. colorant selection mechanism for receiving said modified appearance signals and for selecting corresponding reproduction signals representing values of said reproduction colorants to produce in said medium a colorimetrically-matched reproduction.

2. The system of claim 1 wherein said appearance signals are the RGB tristimulus values of said original.

3. The system of claim 1 further comprising transformation circuitry in said colorant selection means for transforming said modified appearance signals into corresponding color densities for use in selecting said reproduction signals.

4. The system of claim 1 wherein the aesthetic correction circuitry comprises:
 a. storage means for storing the appearance signals from the scanner;
 b. modifying means independent of the storage means for modifying the appearance signals from the scanner;
 c. translation means connected to the modifying means and the storage means for translating the stored appearance signals into aesthetically modified signals upon instruction from the modifying means, and
 wherein the display means comprises a television display device connected to the modifying means

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for displaying the interactively modified appearance signals, the display means having three phosphor light sources, the intensities of which are directly proportional to the appearance signals as modified.

5. The system of claim 4 wherein the aesthetic correction circuitry further comprises an excessive gamut alarm for indicating when a modified appearance signal can not be reproduced by the reproduction colorants.

6. The system of claim 4 where in the translation means further comprises a first color balance means for altering the color values of the appearance signals independently to simulate a different exposure of the original.

7. The system of claim 6 wherein the color balance means further comprises a plurality of tone scale memories which incorporate film transfer characteristics for the separate color values.

8. The system of claim 4 wherein the translation means further comprises a gradation control means for altering the color values of the appearance signals independently to simulate a different contrast and brightness in the original.

9. The system of claim 8 wherein the gradation control means further comprises a plurality of tone scale memories which incorporate brightness and contrast characteristics for the separate color values.

10. The system of claim 4 wherein the translation means further comprises:
 a. translator means for translating color values of appearance signals into luminance-chrominance values; and
 b. second color balance means for altering the chrominance values to adjust independently highlights, midtones and shadows in the original without affecting the gradation.

11. The system of claim 4 wherein the translation means further comprises:
 a. translator means for translating color values of appearance signals into luminance-chrominance values;
 b. polar conversion means for converting cartesian values of chromiance to polar values of hue and saturation;
 c. first color correction means for interactively modifying the luminance, hue, and saturation of individual image samples independently and selectively in a multiplicity of hue bands; and
 d. cartesian conversion means for reconverting the modified polar hue and saturation values into cartesian chrominance values.

12. The system of claim 11 wherein the translation means further comprises a second color correction means for interactively modifying the luminance, hue, and saturation of individual image samples selectively within a chromatic neighborhood of adjustable hue and saturation ranges.

13. The system of claim 6, 7, 8, 9, 10, 11, or 12 wherein the system is divided into a first part comprising a high speed data path in which digital video signals are modified by interaction with the contents of a plurality of random access memories addressed by said digital video signals, and a second part in which the contents of said memories are calculated in response to operator-initiated control settings, at a rate fast enough to give an essentially continuous visual display, but at a rate slower than the data rate in the said first part.

14. The system of claim 1 wherein the colorant selection means further comprises:

a. first processing means to convert the appearance signals into first signals representative of the densities of idealized inks which each absorb light more or less in only one color band;

b. second processing means to convert said first signals into second signals representative of densities of idealized inks, each of which absorbs light in all color bands in approximately the same degree as the real inks to be used for reproduction; and

c. third processing means comprising a lookup table for converting said second signals into colorant values so that the combination of colorants forms a colorimetric match with said appearance signals.

15. The system of claim 14 wherein the system further comprises under-color removal circuitry comprising:

a. fourth processing means to calculate black colorant values as a function of the appearance signals; and

b. fifth processing means to calculate signals representative of reduced idealized ink densities, each absorbing in only one color band, which combination of reduced inks together with a selected amount of black, form a color which approximately matches that of the combination of idealized inks before reduction.

16. The system of claim 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14 or 15 wherein the medium is a gravure printing system.

17. The system of claim 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14 or 15 wherein the medium is a letterpress printing system.

18. The system of claim 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14 or 15 wherein the medium is an offset printing system.

19. In a color reproduction system in which a lookup table is used to calculate the desired amount of colorant, the method of finding the entries of said table comprising the following steps:

a. printing a multiplicity of combination of amounts of colorants spanning the full range of such physically realizable combinations;

b. measuring the appearance values of all the combinations using a colorimetric and calculating the corresponding lookup table inputs;

c. choosing a trial set of entries of said table on the basis of the results of steps (a) and (b);

d. printing color patches corresponding to each of said entries, measuring their appearance values with a colorimeter, and calculating the corresponding lookup table inputs;

e. determining the lookup table outputs corresponding to the said inputs;

f. printing the colorants of step (e), measuring the corresponding appearance values, and calculating the corresponding lookup table inputs;

g. on the basis of the results of steps (d) through (f), adjusting the lookup table entries in such a direction as to reduce the discrepancy between successive sets of lookup table inputs; and

h. repeating the process until the discrepancy between results on successive iterations is acceptably small.

20. A method for reproducing a color original using a selected multiplicity of reproduction colorants, the method comprising:

(a) scanning said original to produce a set of three tristimulus appearance signals dependent on the colors in said original;

(b) surrounding and illuminating the original with a reference white border;

(c) displaying said appearance signals as an image on a television display device having three phosphor light sources, the intensities of which are directly proportional to the appearance signals, the display device also comprising an illuminated reference white element;

(d) modifying the appearance signals until the displayed image is a colorimetric match of the reference white illuminated original;

(e) translating the modified appearance signals into colorant value signals;

(f) selecting the amounts of particular colorants in response to the colorant value signals; and

(g) using said colorants to form a reproduction.

21. In a color reproduction system in which a lookup table is used to calculate the desired amount of colorant, the method of finding the entries of said table comprising the following steps:

a. printing a plurality of colorant combinations with varying amounts of colorants spanning the full range of physically realizable combinations;

b. measuring the appearance values of each of said combinations using a colorimeter and calculating a corresponding lookup table input value;

c. choosing a set of initial entries for said table on the basis of the results of steps (a) and (b);

d. determining the lookup table outputs corresponding to the said inputs; and

e. filling said table with additional input and output values by interpolating between said input and output values of said initial entries.

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CMY equal to 0, 32, 64, . . . 256, together with the corresponding measured RGB values. These are then processed by TSM's, 63, and B-matrix, 70, to give C'M'Y' values which in general do not include the values 0, 32, 64, . . . 224. Thus the experimental values are not coincident with the desired LUT entries, but are interspaced between them in color space. The LUT entries must be found from the experimental data by a process of interpolation. Any known interpolation process is within the scope of the invention. For example, we have used a manual, graphical method where contours of constant C'M'Y' were drawn in between the experimental points located in CMY space.

It should be noted that a considerable amount of variability will be found in the colorimeter readings of the experimental ink patches. When finding the B-matrix coefficients by regression, this variability is automatically averaged out. However, when interpolating, some averaging of the data is an essential preparatory step. It is also advisable to adopt some method for detecting highly erroneous data due to some random defect in ink or paper, so that such data can be excluded from the process.

The LUT values can also be found by an iterative method which lends itself to rapid machine computation. The steps in this process are as follows (a) Begin with approximate values of the LUT entries, obtained by manual interpolation or by any other convenient method. Print these colors, measure the corresponding RGB values, and process the latter with modules 63 and 70, finding the corresponding C'M'Y' values; (b) Adjust the LUT entries according to the error in C'M'Y', so as to reduce said error on the next iteration of the procedure; and (c) Repeat the process until the error is reduced to an acceptably small value.

The repeated printing step, which is very time-consuming, can be avoided by interpolating within the experimental data. This amounts to using the experimental data in a LUT exactly like 80, except that when interpolating from CMY to RGB (or directly to C'M'Y'), the experimental patches are precisely the entries required for the table, since CMY have the values 0,32, 64, . . . 224.

8. The Four-color Case

For understanding the four-color case, we return to FIG. 5, including blocks 65 and 67. Recall that the sensation of color has only three degrees of freedom, i.e., three numbers serve to specify the appearance of any color. Obviously, therefore, we cannot independently specify all four ink densities and have the resultant ink mixture match a given color. In fact, any one of them can be specified independently and then only one unique combination of the remaining three can be found to make the match. A limitation on this process is found in the limited range of each ink. If the "match" calls for a negative density of any ink, or an amount in excess of the maximum printible density, then such a combination is physically unrealizable.

To elucidate the relationship of the black ink to the others, it is necessary to print all combinations of all four inks, for example nine different densities, ranging from zero to maximum, of each of the four inks, for a total of 6561 color patches, and then measure the resulting colors (i.e., RGB values) on a colorimeter. There will be a certain gamut obtainable with the three colored inks only, and a different gamut obtainable when at least some black is used. There will be an overlap of

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these two gamuts, and in this first range, for each color, there will be a certain range of black which is permissible. However, there also will be a second range of colors in which no black is permissible (generally these are colors using only one or two colored inks) and there will be a third range of colors which require the use of at least some black.

In the normal use of UCR, as indicated by the name of the process, black is used to replace some colored ink. This is possible only in the aforesaid first range. In the second range, no black can be used at all. The third range, representing many useful dark colors, cannot be attained by the normal operation of UCR. The present invention provides a method to obtain nearly the entire gamut of colors physically achieveable with the four printing inks.

If the inks were transparent, the density at any wavelength would be the sum of the densities of the separate inks at such wavelength. Prior art UCR uses this concept to add an amount of black at each point which is a given percentage, called the UCR percentage, of the lowest of the three ink densities. Each colored ink density is then reduced by the density of black chosen, theoretically resulting in unchanged values for the ink density as measured in the blue, green, and red parts of the spectrum, and therefore giving the same color. This procedure is defective for two reasons. One is that due to partial nontransparency of the inks, the total density is actually less than the sum of the component densities. Therefore colors with and without black will not match exactly. In addition, there is no way to reproduce colors in the aforesaid third range.

Aside from the fact that the prior art UCR method is inaccurate and that the complete gamut of colors cannot be produced, there is no good reason to use a constant percentage UCR, regardless of the overall density level. The reason for using any black at all in the prior art is primarily to reduce the amount of more expensive colored ink. Because of non-transparency, the amount of colored ink saved in light areas is substantially less than the amount of black added. Thus there is very little money to be saved by using black in light tones, since very little colored ink can be removed. Another reason for not using much black in light tones is that any error in the black calculation will produce an easily perceived reduction in image quality. In the dark areas, there is no reason for using only a little black. The colored ink reduction need not be calculated so accurately and, by using a large amount of black, a large amount of colored ink (and money) can be saved. Furthermore, in order to produce those colors in which one or two of the colored ink densities are zero, 100% UCR is required. For these reasons, the present invention provides for the use of a low percentage UCR in light tones, and a high percentage UCR in dark tones.

In FIG. 5, it is recognized that the quantities C'M'Y' are the densities of non-real inks, and thus can be made high enough to represent all the colors which are achievable with the four real inks. Thus the UCR concept can be applied to these non-real inks and still obtain the entire gamut. This is done by specifying the amount of black at each point in the LUT, ranging from none at all in the areas of one or two colored inks only (the second range) and in the very light tones of the first range, smoothly increasing in the darker tones of the first range, and then going up to a maximum of black in the colors in the aforesaid third range. FIG. 6 shows contours of constant black level as might be reasonable

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14. The system of claim 1 wherein the colorant selection means further comprises:

  a. first processing means to convert the appearance signals into first signals representative of the densities of idealized inks which each absorb light more or less in only one color band;

  b. second processing means to convert said first signals into second signals representative of densities of idealized inks, each of which absorbs light in all color bands in approximately the same degree as the real inks to be used for reproduction; and

  c. third processing means comprising a lookup table for converting said second signals into colorant values so that the combination of colorants forms a colorimetric match with said appearance signals.

15. The system of claim 14 wherein the system further comprises under-color removal circuitry comprising:

  a. fourth processing means to calculate black colorant values as a function of the appearance signals; and

  b. fifth processing means to calculate signals representative of reduced idealized ink densities, each absorbing in only one color band, which combination of reduced inks together with a selected amount of black, form a color which approximately matches that of the combination of idealized inks before reduction.

16. The system of claim 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14 or 15 wherein the medium is a gravure printing system.

17. The system of claim 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14 or 15 wherein the medium is a letterpress printing system.

18. The system of claim 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14 or 15 wherein the medium is an offset printing system.

19. In a color reproduction system in which a lookup table is used to calculate the desired amount of colorant, the method of finding the entries of said table comprising the following steps:

  a. printing a multiplicity of combination of amounts of colorants spanning the full range of such physically realizable combinations;

  b. measuring the appearance values of all the combinations using a colorimetric and calculating the corresponding lookup table inputs;

  c. choosing a trial set of entries of said table on the basis of the results of steps (a) and (b);

  d. printing color patches corresponding to each of said entries, measuring their appearance values with a colorimeter, and calculating the corresponding lookup table inputs;

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  e. determining the lookup table outputs corresponding to the said inputs;

  f. printing the colorants of step (e), measuring the corresponding appearance values, and calculating the corresponding lookup table inputs;

  g. on the basis of the results of steps (d) through (f), adjusting the lookup table entries in such a direction as to reduce the discrepancy between successive sets of lookup table inputs; and

  h. repeating the process until the discrepancy between results on successive iterations is acceptably small.

20. A method for reproducing a color original using a selected multiplicity of reproduction colorants, the method comprising:

  (a) scanning said original to produce a set of three tristimulus appearance signals dependent on the colors in said original;

  (b) surrounding and illuminating the original with a reference white border;

  (c) displaying said appearance signals as an image on a television display device having three phosphor light sources, the intensities of which are directly proportional to the appearance signals, the display device also comprising an illuminated reference white element;

  (d) modifying the appearance signals until the displayed image is a colorimetric match of the reference white illuminated original;

  (e) translating the modified appearance signals into colorant value signals;

  (f) selecting the amounts of particular colorants in response to the colorant value signals; and

  (g) using said colorants to form a reproduction.

21. In a color reproduction system in which a lookup table is used to calculate the desired amount of colorant, the method of finding the entries of said table comprising the following steps:

  a. printing a plurality of colorant combinations with varying amounts of colorants spanning the full range of physically realizable combinations;

  b. measuring the appearance values of each of said combinations using a colorimeter and calculating a corresponding lookup table input value;

  c. choosing a set of initial entries for said table on the basis of the results of steps (a) and (b);

  d. determining the lookup table outputs corresponding to the said inputs; and

  e. filling said table with additional input and output values by interpolating between said input and output values of said initial entries.

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